

Appendix E

Regulation 19(1) Summary of Main Issues Raised and Officer Response

1. Introduction

Who raised the issue	Summary of Issue	OPDC Response
<p>Old Oak Interim Forum, Wells House Road Residents Association, and 11 residents</p>	<p>Strategic policies: Disagree that the Local Plan should set out which are and which are not strategic policies. Particularly disagree with the place policies as being strategic policies</p>	<p>Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.</p>

2. Spatial Vision

Who raised the issue	Summary of Issue	OPDC Response
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Hammersmith Society, Wells House Road Residents Association, and 11 residents	Community-led Vision and Objectives: The alternative Community-led Vision and Objectives suggested by the Hammersmith Society is still relevant.	The Community-led vision and objectives submitted with the Regulation 18 consultation responses by the Hammersmith Society have been embedded within the amended Spatial Vision, narratives and policies.
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3. Strategic Policies

Who raised the issue	Summary of Issue	OPDC Response
Grand Union Alliance, Sport England, Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association and 11 residents	Improving health and reducing health inequalities: The Local Plan should include further policy detail about the various factors that contribute to good health and what impacts negatively on health.	Some amendments have been made to the supporting text to identify some further positive of negative determinants of health, but these have not all been included as there are a multitude of factors that impact on health and well-being and the supporting text clarifies that these are addressed through a number of policies throughout the Local Plan.
Hammersmith Society, Wells House Road Residents Association, and 11 residents	Densities: The densities proposed in the Local Plan exceed established guidelines. The Plan is therefore unsound.	In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The Draft New London Plan does not include a density matrix as it has been recognised by the Mayor that it did not appropriately recognise local context. The draft London Plan policy D6 recognises that appropriate densities should be determined through consideration of the site context, access to public transport accessibility and the capacity of surrounding infrastructure.
Hammersmith Society, ArtWest, St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Dave Turner,	Building heights: Insufficient justification for tall buildings and demonstration that this will deliver lifetime neighbourhoods has been provided. The Plan does not provide enough clarity on future	Further wording has been inserted into the supporting text of SP9 to clarify the average densities expected in the OPDC area based on DCS outputs to achieve homes and jobs targets.

<p>TITRA, Grand Union Alliance, Midland Terrace Residents, and 15 residents</p>	<p>building heights, locations of tall buildings or definitions of tall buildings. A map of tall building locations should be provided. Indicative building heights of 40 storeys + are not justified. Density information in DCS is not reflected in the Local Plan</p> <p>This does not conform with London Plan policy 7.7 or NPPF para 58 and 59.</p>	<p>Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas.</p> <p>An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings, but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory.</p> <p>OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF paragraphs 58 and 59.</p>
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4. Places

Who raised the issue	Summary of Issue	OPDC Response
<p>Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, and 11 residents</p>	<p>Place policies: The policies are too detailed and should instead be replaced by area action plans and neighbourhood plans</p>	<p>Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general</p>

		conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
HS2 Ltd.	HS2 Station capacity: Development capacity proposed on the HS2 station and surrounds is not justified. This level of development would not be supported by enabling works currently proposed by HS2. Suggest that policies are drafted more flexibly to allow for a range of development scenarios.	The capacity for the HS2 triangle site has been revised following further development capacity work to align with the proposed HS2 enabling works.
Transport for London	Elizabeth Line Depot: Development of the Elizabeth Line Depot and Train Maintenance Depot should be delayed beyond the plan period.	OPDC has removed the delivery of development on the Elizabeth Line and Train Maintenance depot from the Plan period.
Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, and 11 residents	Old Oak North Densities: Without a commitment to the delivery of Hythe Road Station, the densities in Old Oak North are unjustified resulting in the policy being ineffective.	Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and

		existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels (PTAL 6B) to support the density of development.
Osbourne Investments Limited and Quattro Holdings Limited	Elizabeth Line spur: The Elizabeth Line rail spur has not been proved feasible or financially viable, and is not safeguarded by appropriate bodies. Safeguarding of the line has major impacts on the developability of the site, and clarify is required on its feasibility.	Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the decision to explore the delivery of the West London Orbital Line and Chiltern Line. References to safeguarding land to facilitate delivery of the spur have been removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for West London Orbital Route Line in Acton Wells.
London Borough of Brent, Harlesden Neighbourhood Forum	Willesden Junction: The proposed links from Willesden Junction Station in the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.	There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
Wormwood Scrubs Charitable Trust	Wormwood Scrubs: Evidence should be provided for the need for any routes and enhancements to the Scrubs.	The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor

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

Who raised the issue	Summary of Issue	OPDC Response
Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, and 11 residents	Engagement with local people: The policy is not effective. Further clarity required for setting out different options and proactive community engagement. It should refer to the need for engagement with local people, via neighbourhood forums, as early as possible in the design process.	Proactive engagement is set out in OPDC's Statement of Community Involvement. This was updated in February 2017 to reflect requests by community groups to secure more effective engagement. The Community Review Group is being established to inform the development management process. This has been referenced in D1. Policy D1 will continue to require major and strategic development proposals to undertaken proactive engagement with the community.
Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, and 11 residents	Access to public realm: Need to be clearer about the need for public realm to be genuinely public.	Policies SP2, SP9, D2 and P7 provide guidance to delivery new high quality public realm and improve the existing public realm of North Acton.
Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, and 11 residents	Fire resilience: OPDC needs to reconsider its approach to tall buildings in light of the Grenfell Tower tragedy including considering fire risk and associated costs.	OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect Draft New London Plan policy D11 and Building Regulations requirements. This will be applied to all buildings including tall buildings.
Grand Union Alliance, Wells House Road Residents Association, and 11 residents	Development capacity and resultant building heights: Heights are driven by untested London Plan development capacities. This is demonstrated by tall buildings planned along Scrubs Lane. Rationale is not justified.	OPDC considers the homes and jobs targets for each place are justified. These are based on development capacity information set out in OPDC's Development Capacity Study. This has been developed in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. The Development Capacity Study is based on development capacity information set out in the Old Oak North Development Framework Principles the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document

		and the Victoria Road and Old Oak Lane Framework Principles. Justification for tall buildings for Scrubs Lane is set out in the Scrubs Lane Development Framework Principles and reflected in OPDC's Tall Building Statement.
Historic England	Designated heritage assets: D8 should provide policy for how designated heritage assets will be considered rather than defer to the NPPF and national guidance. This will ensure accordance with NPPF paragraphs 9, 12 and 126.	The policy has been amended to include policy guidance for designated heritage assets.

6. Environment and Utilities

Who raised the issue	Summary of Issue	OPDC Response
London Borough of Hammersmith & Fulham, Grand Union Alliance, Wells House Road Residents Association and 11 residents	Air quality: There is a concern that the air quality policy is weak and ineffective As London Borough of Hammersmith & Fulham is an Air Quality Management Area under the 1995 Environment Act – Part IV, impacts of any development must be agreed with the Council.	The policy requiring Air Quality Assessments has been significantly strengthened to address stakeholder comments and to conform with Local Authority approaches to air quality if AQMAs.
Hammersmith Society, Wells House Road Residents Association and 11 residents	Fire resilience: Consultees supported policy EU8 (sustainable materials) but were concerned that the impacts of fire safety following the Grenfell tragedy should be reflected in the policy	This has now been addressed in Policy D4 which maximises buildings' resilience and fire safety in accordance with the latest Building Regulations and London Plan policies.
Grand Union Alliance, Wells House Road Residents Association and 11 residents	Strengthen Green Space Factor: Green Infrastructure and Open Space Strategy and Management Plan should adopt clearer strategy around Green Space Factor and Green Points system implementation	OPDC have been working with GLA to support adoption of the green Space Factor in the London Plan. Supplementary Planning Guidance is proposed by the Mayor to provide clarity around how this is to be adopted.
Hammersmith Society, Wells House Road Residents Association and 11 residents	Light pollution: Policy should consider impact of light pollution	This is now addressed in Policy D6 (Amenity) and Policy EU2. For residential uses, careful consideration will need to be given to the design and location of habitable rooms, including the location and design of bedrooms to mitigate light

Who raised the issue	Summary of Issue	OPDC Response
		pollution and consideration should be given to the impact of light pollution on biodiversity.

7. Transport

Who raised the issue	Summary of Issue	OPDC Response
Brent Cyclists, Grand Union Alliance, Hammersmith Society, Wells House Road Residents Association, London Borough of Hammersmith and Fulham, Park Royal Business Group, West Twyford Residents Association and 11 residents	London Cycle Design Standards: On network planning issues comments were made that there was insufficient explanation of how the LCDS would be applied.	The OPDC will invest in create new and improved routes and enhancing area wide cycle permeability. The LCDS will apply and this includes items such as segregation, gradients, and end of journey facilities. The Local Plan has been amended to state that the LCDS will apply to the creation of all cycle infrastructure.
Grand Union Alliance, Wells House Road Residents Association, CBRE, ArtWest, and 11 residents	Parking restrictions: There is a need to recognise the parking needs of businesses and industry and parking restrictions may not be appropriate to apply to this activity.	Whilst apply parking restrictions will be challenging the policy and supporting text recognise that in Park Royal, planning applications will be managed on a case by case basis.

8. Housing

Who raised the issue	Summary of Issue	OPDC Response
Old Oak Park Limited, Castlepride Limited Brent Council, Ealing Council, Harlesden Neighbourhood Forum; Harlesden Lets, Old Oak Interim Neighbourhood Forum, Grand Union Alliance, Crisis Brent, Wells House Road Residents Association, 13 residents	<p>Affordable housing target and tenure:</p> <p>Developers have challenged whether the target is feasible given the need to fund infrastructure and the challenging local constraints on sites (i.e. contamination).</p> <p>The councils and community groups have also challenged the deliverability of the target, but also consider that the tenure split should require a greater proportion of LAR housing, to align with the need identified in OPDC's Strategic Housing Market Assessment for over 80% LAR.</p>	<p>The Mayor's draft new London Plan will require mayoral bodies, public land and land de-designated from SIL to achieve 50% affordable housing. A reduction in this overall strategic target would not be supported by the Mayor and it is therefore not proposed to change this.</p> <p>In accordance with the NPPF, OPDC has set out objectively assessed need (OAN) in the SHMA which has determined that there is a need for 1,200 homes within the redline boundary. Whilst the proposed tenure split in the Local Plan) does not directly marry up with the tenure requirements in the SHMA, the objectively assessed need in terms of tenure split is likely to be achieved due to</p>

		the over delivery of housing above the objectively assessed need for 1,200 homes as demonstrated by the Development Capacity Study and phasing plan.
Old Oak Park Limited, Fruition Properties, Hammersmith Society, Wells House Road Residents Association, 13 residents	<p>Family housing: Developers suggest the target will be challenging to achieve at high densities.</p> <p>Community groups also recognise the challenge of achieving the target at high densities, but want the target increased to 50% family housing to meet needs identified in OPDC's Strategic Housing Market Assessment.</p>	Officers do not propose to increase the family housing target as it is recognised that the target will be challenging to achieve at high densities.
Royal Borough of Kensington & Chelsea	Gypsy and Traveller Accommodation: OPDC should assess the capacity to provide pitches to meet Gypsy and Traveller Accommodation need.	OPDC has provided an Addendum to the Gypsy and Traveller Accommodation Assessment and assessed that there is no capacity for sites to deliver additional pitches.

9. Employment

Who raised the issue	Summary of Issue	OPDC Response
SEGRO London Borough of Ealing	Industrial intensification: Requests for OPDC to be clearer about support for industrial intensification to ensure that Park Royal SIL can support the attainment of jobs targets	Wording in the Place and employment policies have been revised to provide clearer support for and requirements for industrial intensification and industrial Site Allocations have been incorporated into the Local Plan
ACAVA; Hammersmith Society; Wells House Road Residents Association; Grand Union Alliance;;London Borough of Brent; Hammersmith Society; Harlesden Lets, Wells House Road Residents Association; 13 residents	Affordable workspace: Requests for Local Plan to make a strong commitment and provide further detail on affordable workspace.	<p>The Local Plan will continue to require an appropriate quantum of affordable workspace which would be assessed on a case by case basis. This provides flexibility to determine the most suitable approach.</p> <p>In addition to this, OPDC may provide more detail on implementing this policy through the preparation of an Affordable Workspace Supplementary Planning Document (SPD). An SPD could be updated more regularly than a Local Plan document</p>

Who raised the issue	Summary of Issue	OPDC Response
Grand Union Alliance, Wells House Road Residents Association, GLA; SEGRO; Old Park Limited; and 13 residents	Business relocations: Community groups have expressed concerns about the impacts on jobs and business losses. There are requests for further clarity and detail on how business relocations would be managed and some questioning the requirements for this	Amendments have been made to the policy and supporting text to clarify arrangements to support co-location and manage the relocation of businesses
TITRA; Grand Union Alliance, Wells House Road Residents Association, 21 residents	Waste sites: Existing waste facilities, particularly Powerday, negatively impact on residential uses and should not remain in the area	The existing waste facilities safeguarded in the Local Plan are needed to help meet waste management needs in Hammersmith and Fulham, Brent and Ealing. The Local Plan seeks to ensure future proposals adequately mitigate their impact on amenity.
Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association; Ashia Centur Limited; Raban Goodhall Ltd; and 13 residents	Further land should be de-designated from Strategic Industrial Location: Request for additional sites/areas to be released from SIL or allowed to be to be developed for mixed-uses.	Additional work has been undertaken to assess whether additional changes to the SIL boundary are appropriate and in relation to the Twyford Tip (or Land at Abbey Road) site. Recommendations in the evidence base are reflected in the Local Plan.

10. Town Centre and Community Uses

Who raised the issue	Summary of Issue	OPDC Response
Brent Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents.	Impact Assessment: the threshold of 5,000sqm for Impact Assessments within Old Oak Major town Centre should be reconsidered and revised down to the NPPF 2,500sqm threshold	The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.

Who raised the issue	Summary of Issue	OPDC Response
<p>Citrus Group and Fuller Smith & Turner</p> <p>Mayor of London, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents.</p>	<p>Pubs: The policy is overly restrictive and repeats policies covered elsewhere or includes too specific or onerous policy requirements.</p> <p>Conversely, a number of stakeholders supported the current policy and strong protection of pubs.</p>	<p>Some amendments have been made to the policy to avoid repetition with other policies and to improve the flow of the policy, but the policy still seeks to protect pubs and requires appropriate marketing of the premises before the acceptability of another use would be considered.</p>
<p>Hammersmith and Fulham Council, Brent Council, Ealing Council, Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association and 11 residents</p>	<p>Social infrastructure: Requests for the policy to be strengthened with regard to protection of existing uses and support for new uses. Comments were also raised on the methodology and assumptions within the Education and Health Needs Study</p>	<p>Some amendments have been made to the social infrastructure policy (TCC4) to strengthen requirements for protection and support for new social infrastructure. The Education and Health Needs Study has been superseded by the Social Infrastructure Needs Study which, where appropriate, addresses the comments made on this study</p>
<p>Sport England, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents</p>	<p>Sports facilities and playing fields: Amendments to the policy were suggested to give stronger protection to existing facilities, to align more closely to the NPPF and for playing fields to be appropriately addressed in the policy.</p>	<p>The policy has been amended to more closely align with the NPPF and give stronger protection to existing facilities. The policy has also been revised to address the need for playing fields.</p>
<p>Mayor of London, Brent Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents</p>	<p>Town centre uses and A-Class uses: Suggestions that the policies for town centre uses (TCC1) and A-class uses (TCC3) should be amended to ensure strands relating to town centre uses are all covered within TCC1 and that the policy ensures significant adverse impacts to surrounding centres are appropriately mitigated and to ensure that town centre uses within SIL are being appropriately managed.</p>	<p>The policies have been re-ordered so that the strands previously in TCC3 and in the places chapter are now all covered within TCC1. The policy lead in text for TCC1 has been amended to clarify that the strands of the policy are working to the aim of avoiding significant adverse impacts to surrounding centres. The policy regarding town centre uses within SIL has also been appropriately amended.</p>
<p>Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association and 11 residents.</p>	<p>Cumulative Impacts: The policy should be revised to state that development proposals should not have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres</p>	<p>While it was part of PPS4, the NPPF doesn't have a cumulative impact test, requiring schemes below locally set impact assessment thresholds to submit impact assessments. There's a</p>

Who raised the issue	Summary of Issue	OPDC Response
		<p>requirement for schemes over the default threshold to take account of cumulative developments in testing impact, but if the scheme is under the threshold in the first place, there is no cumulative trigger for undertaking an assessment. An addendum has been added to the Retail and Leisure Needs Study to clarify national policy in this respect.</p>

11. Delivery and Implementation

Who raised the issue	Summary of Issue	OPDC Response
Castlepride Ltd and Segro.	<p>Balancing priorities: Need to recognise site specific constraints and constraints affecting development feasibility and viability and other 'non infrastructure' planning obligations when considering the implementation of the Local Plan.</p>	<p>This has been included in the policy, but text has also been 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 Mayor's Affordable Housing and Viability SPG.</p>
<p>Grand Union Alliance, Hammersmith Society, Wells House Road Residents Association and 11 residents</p> <p>Old Oak Park Limited</p>	<p>Viability: There is no clear approach to addressing the funding gap and the implementation of the Local Plan is therefore compromised.</p> <p>Concerns have also been raised about the viability of delivering the affordable housing and employment policies.</p>	<p>Policy DI1 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>The Whole Plan Viability Study, included in the evidence base, has assessed all the Local Plan policies to identify those policies likely to impact on development viability, such as affordable housing, infrastructure (including Community Infrastructure Levy), environmental standards,</p>

Who raised the issue	Summary of Issue	OPDC Response
		open space requirements and employment policies (including affordable workspace and commercial floorspace at Old Oak Common Station). The conclusion of the Whole Plan Viability Study is that in the round, the policies contained in the Local Plan would be viable.
Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association and 11 residents	Community Engagement: Policy D13 is not sound because OPDC has not upheld its Statement of Community Involvement (SCI), appropriately engaged with community groups and did not designate the Old Oak Neighbourhood Area as submitted.	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. 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

Appendix F: List of all Issues Raised and Officer Responses at Regulation 19 1st Stage

Issues raised by representations on the Regulation 19(1) revised draft Local Plan and how these have been dealt with in the Regulation 19(2) second revised draft Local Plan

The below provides an overview of the issues raised on the Regulation 19(1) revised draft Local Plan. This appendix accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 17d) parts (iii) and (iv). This section has been ordered in accordance with the Regulation 19(1) revised draft Local Plan, dealing with issues in the following order:

1. General issues and the introduction chapter
2. Spatial vision
3. Strategic policies chapter
4. Places chapter
5. Design chapter
6. Environment and utilities chapter
7. Transport chapter
8. Housing chapter
9. Employment chapter
10. Town centre and community uses chapter
11. Delivery and implementation chapter
12. Glossary
13. Appendix: Background and context
14. Supporting studies including the Integrated Impact Assessment (IIA)

The following tables include 5 columns:

1. provides a unique comment reference, which corresponds, where appropriate to the comment references highlighting changes made in response to comments in the track changed copy of the 2nd Regulation draft Local Plan.
2. provides details on which chapter, policy, figure, table, paragraph or supporting study the comment relates to.
3. provides a summary of the issue raised on the Regulation 19(1) Local Plan.
4. identifies how many stakeholders raised the issue.
5. identifies the names of the stakeholders who raised the issue.
6. identifies OPDC's response to the comment. The response is precluded by either 'no change proposed', 'change proposed' or 'noted' and is followed, where relevant and appropriate, with an explanation of the response and/or the approach OPDC has taken to addressing the comment.

1. General issues and the introduction chapter

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G1	General	Local Plan should have strategy for areas outside of its boundary	1	A. Anderson	No change proposed. OPDC is not the planning authority for areas outside of its boundary; however, as identified in the supporting text (para 3.8) to Policy SP1, OPDC is working positively with the surrounding local planning authorities to ensure development and growth within the OPDC complements other areas of growth and that regeneration brings economic benefits to surrounding communities.
G2	General	Consider the plan as whole to be sound, positively prepared and legally compliant	3	Culinary Quarter (London) Ltd, Association for Consultancy and Engineering (ACE), Environment Agency	Noted
G3	General	Broadly support the aims and aspirations of the Local Plan	11	HS2 Ltd, Osbourne Investments Limited and Quattro Holdings Limited, Fairview Estates (Housing) Ltd, Mayor of London, Association for Consultancy and Engineering (ACE), Tim Potter, Royal Borough of Kensington and Chelsea, Environment Agency, Health and Wellbeing Board - London Borough of	Noted

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Ealing, Hammersmith and Fulham Council, ArtWest, TfL Commercial Development	
G4	General	The Plan needs to set out an approach that delivers real benefits and does not simply financialise land and provide developers with profit	2	Professional Land Research Group and Coalition for Economic Justice, Regent's Network	No change proposed. OPDC considers that the policies in the Local Plan support the sustainable regeneration and redevelopment of the area. OPDC would expect developers to make an appropriate level of profit, to incentivise development, but viability assessments will be used to ensure that developers are making appropriate contributions towards the delivery of affordable housing and infrastructure.
G5	General	The plan's figures are below those set out in the London Plan, but the Local Plan does identify that the overall capacity is in line with the London Plan targets but that some of this falls outside of the Plan period.	1	Mayor of London	Noted.
G6	General	Should consider developing some early improvement strategies for key early phases such as along Old Oak Lane.	1	Health and Wellbeing Board - London Borough of Ealing	No change proposed. OPDC's Local Plan is supported by a Development Capacity Study, which has been undertaken in accordance with NPPG guidance. This shows the sites capable of being delivered in the next 0-5 and 5-10 years. OPDC will secure appropriate contributions from developments towards improvements in these locations. OPDC have

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					also secured funding from the Great Places Scheme which is looking to support early culture and community based place-making initiatives in these locations.
G7	General	The Plan has failed to address the needs of the disabled and elderly	1	Friary Park Preservation Group	No change proposed. The Local Plan includes a wide range of policies seeking to address the needs of the disabled and elderly. This includes Policies SP9 and D3 which requires development to be accessible and inclusive, Policy H3 which requires 10% of homes to meet M4(3) Building Regulations and Policy H9 which supports the provision of specialist housing.
G8	General	The online survey questions on the soundness of the plan were difficult to respond to. Do not understand what terms like 'legally compliant' means.	12	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 online survey followed a similar format to other online surveys. The criticism relates to the use of the words such as 'justified', 'sound', 'legally compliant' and 'positively prepared'. These terms were defined on OPDC's website and as part of leaflet consultation material and presentations at drop-in sessions also clarified what was meant by these terms. Government publications and websites also provide clarity on what is meant by these terms.
G9	General	Disappointed by the lack of vision and creativity in the plan.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. OPDC considers that the Local Plan strike an appropriate balance between being aspirational and visionary, but also being deliverable, as required by the NPPF.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G10	General	The strategic targets set for the area in the London Plan will result in an unsuccessful urban environment	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. The London Plan targets underwent their own examination as part of the London Plan. OPDC has also undertaken a Development Capacity Study in support of the Local Plan, which was undertaken in accordance with NPPG targets and which shows the target to be achievable, albeit not wholly within the next 20 years covered by the Local Plan
G11	General	Do not consider that the Local Plan is clear and transparent as required by the NPPF	1	St Quintin and Woodlands Neighbourhood Forum	Noted. OPDC considers the document to be generally clear and transparent but has taken on board some of the suggested revisions to make the document clearer and more transparent, where it was felt that this was necessary.
G12	General	OPDC has been using the emerging Local Plan to assess and determine planning applications, beyond the level intended by the NPPF	1	St Quintin and Woodlands Neighbourhood Forum	Noted. Officers have given the emerging Local Plan the appropriate material weight in accordance with the NPPG on Local Plans (ID: 12-019-20140306)
G13	General	Need to learn from the mistakes of other Mayoral Development Corporations and other Opportunity Areas	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. Lessons have been learnt from other major regeneration projects in the development of the Local Plan. The Local Plan is supported by a Precedents Study which includes some of these lessons.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G14	General	Given the global and UK economic climate there is no certainty that the homes and jobs targets will be realised and there are no contingency plans if they are not.	13	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 Local Plan is supported by Key Performance Indicators and if as a result of changing economic conditions, policies and targets in the Local Plan are not being delivered, this would trigger a review of the relevant policy.
G15	General	There has been a recent lack of community engagement by OPDC due to staff absences and this has hindered communities' ability to respond to the Local Plan and other OPDC matters	13	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. Officers undertook a lengthy consultation exercise as part of the public consultation on the Regulation 19 Local Plan. The document was consulted on for 11 weeks - well in excess of the 6 week requirement outlined in OPDC's Statement of Community Involvement. OPDC also offered extensions to the consultation to consultees who requested an extension. Officers hosted 6x1.5 hour drop-in sessions, consisting of a presentation and question and answer session. Officers also hosted two live Twitter sessions. Prior to consultation, officers also hosted two

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					presentation events, to provide community groups with an overview of the results and key changes resulting from the Regulation 18 consultation and to inform stakeholders of the content of the Regulation 19 Local Plan and how stakeholders should respond to the consultation. During the consultation, emails to OPDC officers were responded to as soon as was practicable. The consultation activities associated with the Regulation 19 Local Plan exceeded nationally set requirements and OPDC's own Statement of Community Involvement requirements. Further details on OPDC's engagement activities in respect of the Local Plan can be found elsewhere in this Statement of Consultation document.
G16	General	Until the HS2 station has been designed and the Old Oak masterplan has concluded, the Plan should be found unsound	14	Hammersmith Society, 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	Change proposed. Outputs from the Old Oak Masterplan in the form of the Old Oak North Masterplan Framework Principles document have been used to appropriately update the policies in the Local plan. The HS2 proposals are to a certain degree governed by the High Speed Rail (London-West Midlands) Act (2017). For those elements not controlled through the Act and which are controlled through Schedule 17 or other subsequent applications for development or connections around the station, it is important that OPDC takes a plan-led approach and sets out clear

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					policy guidance on how the area should be developed, in accordance with the NPPF.
G17	General	Applications have been approved with excessive densities in spite of objections from communities	15	Hammersmith Society, Old Oak Interim Forum, Regent's Network, 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. Issues raised in relation to planning applications were considered in relation to each respective planning application and are not a matter for the Local Plan examination.
G18	General	The plan lacks a strong overall development management policy	13	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. It is not clear what is meant by this statement as the Local Plan includes a substantial number of development management policies. Therefore, no changes have been made to the Local Plan that directly relate to this issue.
G19	General	Support the inclusion of scales on figures	1	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G20	General	All transport proposals in the Local Plan are depicted by illustrative sketch diagrams, and don't provide details of existing transport infrastructure of how proposed infrastructure will fit into available space.	1	West Twyford Residents Association	No change proposed. There are a number of figures in the Local Plan that depict the existing transport infrastructure. Figures showing new transport infrastructure are included in illustrative sketch diagrams because in most instances, the exact locations for their provision have not yet been fixed. This even includes the exact shape of the HS2/Elizabeth line station at Old Oak Common, although the HS2 safeguarding is included in the Policies Map.
G21	General	Little has changed from the first draft Local Plan to the revised draft Local Plan. OPDC has generally ignored or dismissed comments from the local community and residents	14	Old Oak Interim Forum, 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. Substantial changes were made from the 1st draft to the 2nd draft in response to points made by local community groups. This includes, inter alia, identifying two new 'places', identifying a neighbourhood town centre for Atlas Junction and setting clearer policy targets for open space provision and social infrastructure provision. OPDC's Statement of Consultation sets out the various changes made to the Local Plan from 1st to 2nd draft in response to community group comments.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G22	General	There is a significant gap between the rhetoric in the vision and the reality of what has been and what will be delivered over the plan period.	13	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. Officers consider that the Local Plan is positively prepared and is realistic and deliverable.
G23	General	The Reg 19 Local Plan has been consulted on in advance of the new London Plan, which may revise Londonwide targets downwards	13	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	Change proposed. The New London Plan has been published and this has identified an increased target for OPDC during the first ten years of the new London Plan. This new target has been appropriately reflected in revisions to the submission draft Local Plan.
G24	General	The Old Oak Masterplan will further test capacity and this is likely to identify the repercussions of the densities and revise figures downwards.	13	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,	Change proposed. The Old Oak North Masterplan Framework Principles has further tested development capacity. These revised figures have been included in the updated Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G25	General	Cargiant have reduced their densities and this has resulted in densities going up elsewhere	13	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. Cargiant may have reduced their densities but this has had no bearing on OPDC's Development Capacity Study figures for elsewhere and has not resulted in densities increasing elsewhere in Old Oak.
G26	General	Applications have been approved in advance of the Local Plan being published meaning decisions have not been plan led.	13	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. The NPPF requires applications that accord with the Development Plan to be approved without delay. The London Plan forms part of OPDC's Development Plan, which includes a number of policies against which proposals can be and have been assessed. OPDC's emerging Local Plan also has material weight and as part of the consideration of planning applications, the material weight of the Local Plan has been applied in accordance with NPPG guidance on Local Plans.
G27	General	Originally supported the development of the area but has changed their mind	1	Regent's Network	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G28	General	Do not support the use of infographics between chapters	1	Regent's Network	No change proposed. OPDC considers that the use of infographics between the chapters aids navigation and the enjoyment of the Local Plan and is not proposing to remove these.
G29	General	Should consider the opportunity to bring the Stamford Brook and Counters Creek lost rivers back to the surface.	1	Regent's Network	No change proposed. OPDC supports the provision of water space as part of the green infrastructure network; however, Counters Creek and Stamford Brook are part of the sewage network and consequently, it would be undesirable for them to be brought to the surface.
G30	General	Should not refer to or have precedents in the Local Plan and the word 'precedent' should be removed from the Local Plan	1	Regent's Network	No change proposed. OPDC considers that the precedents aid with the understanding of OPDC's objectives for the area and aid with the transparency and comprehension of the Local Plan.
G31	General	Is not clear to whom consultation responses should have been targeted	1	Regent's Network	Noted. The consultation material included details on where consultation responses should have been addressed. OPDC has not received any complaints from others regarding this not being clear and comments from the Regent's Network were received via the email address that consultation material identified that comments should be sent to.
G32	General	Aspects of Brent's Regeneration Strategy should be included in the proposed development	1	Harlesden Lets	No change proposed. Relevant elements have been incorporated into evidence in support of the Local Plan and where relevant, in Local Plan policy guidance.
G33	General	The plan is long, detailed and onerous, making	1	Old Oak Park Ltd	Change proposed. OPDC considers that the Plan strikes an appropriate balance in the level

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development more burdensome when it should be more streamlined.			of detail it provides, but revisions to try and simplify the Plan have been made where necessary and appropriate. However, OPDC does consider that the Old Oak and Park Royal area is relatively unique in the scale of development envisaged in a relatively small area and by consequence, there is a need for greater detail to be provided in certain circumstances, to support an integrated, comprehensive, optimised and timely approach to the redevelopment and regeneration of the area.
G34	General	The Plan strays into seeking to control areas it should not, such as meanwhile uses, relocating tenants, wages paid to tenants, subsidising business and retail space, control of workspace operators, distribution of residential unit mixes, provision of utilities and the life cycle of materials. these matters are not necessary for the sustainable development of the area	1	Old Oak Park Ltd	No change proposed. Meanwhile uses are dealt with in many other Local Plans. OPDC wants to support the provision of meanwhile uses in the area. The Plan does not require tenants to be relocated, but does require developers to engage with their current businesses and seek to provide units that could enable tenants to relocate. The London Living Wage is an important mayoral priority and OPDC has made edits to clarify that the requirement for London Living Wages to be achieved will be added as an informative to planning decisions. The Local Plan does not seek to subsidise retail space. Affordable workspace is a common policy for Local Plans to include where a local need exists. Equally, residential unit mixes are a common policy requirement, to ensure needs are met. Utilities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					infrastructure is required to support the sustainable development of the area and sustainable use of materials and resources are equally important to support and uphold the sustainable regeneration of the area. OPDC considers that all these policies are consistent with the NPPF and in general conformity with the London Plan and are therefore sound.
G35	General	Concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and HS2	12	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. This issue does not relate to the Local Plan but to separate OPDC corporate activities.
G36	General	The plan is not sound because it has not adequately assessed decontamination costs	13	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. Impacts of contamination costs were assessed in OPDC's Affordable Housing Viability Assessment on the basis of £380,000 per hectare. This has been based on a desktop assessment undertaken as part of the DIFS and the application of a standardised remediation rate. The contamination costs on individual sites are likely to vary significantly and can only be fully understood once detailed site surveys and intrusion works have been undertaken. This would occur when development is brought forward and in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					accordance with Policy DI1, site specific constraints will be considered as a factor in determining viability and although the presence of abnormal site constraints is expected to impact land value, the cost should not necessarily be born through a reduction in planning obligations
G37	General	Support organisation of workshops during consultation	13	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.
G38	General	Should consider producing a shorter term plan to cover 10 years	13	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. The NPPF requires Local Plans to cover a minimum of 15 years. OPDC has opted to produce a Local Plan to cover 20 years to broadly align with the Mayor's London Plan, which also covers 20 years. As a corporation, OPDC is developing shorter term strategies for the early regeneration of the area which are being published. OPDC's planned Scrubs Lane SPD is also a shorter term policy guidance document for this part of the Old Oak area,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					which will undergo redevelopment in the short to medium term.
G39	General	OPDC has not communicated via printed newsletters recently - older people need regular printed information	1	Mark Walker	No change proposed. The Regulation 19 Local Plan was publicised by a newsletter. A copy of this can be found in OPDC's Statement of Consultation.
G40	General	Concern that communities have not been properly consulted or engaged in respect of planning applications	1	Mark Walker	No change proposed. This issue does not relate directly to the Local Plan. Engagement on planning applications has accorded with national requirements.
G41	General	The engagement on the Local Plan has not been adequate for the Reg 19 draft, with presentation sessions and limited time for Q and As	15	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. Officers undertook a lengthy consultation exercise as part of the public consultation on the Regulation 19 Local Plan. The document was consulted on for 11 weeks - well in excess of the 6 week requirement outlined in OPDC's Statement of Community Involvement. OPDC also offered extensions to the consultation to consultees who requested an extension. Officers hosted 6x1.5 hour drop-in sessions, consisting of a presentation and question and answer session. Officers also hosted two live Twitter sessions. Prior to consultation, officers also hosted two presentation events, to provide community groups with an overview of the results and key changes resulting from the Regulation 18 consultation and to inform stakeholders of the content of the Regulation 19 Local Plan and how stakeholders should respond to the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					consultation. During the consultation, emails to OPDC officers were responded to as soon as was practicable. The consultation activities associated with the Regulation 19 Local Plan exceeded nationally set requirements and OPDC's own Statement of Community Involvement requirements. Further details on OPDC's engagement activities in respect of the Local Plan can be found elsewhere in this Statement of Consultation document.
G42	General	The Mayor's Review of OPDC calls into question how infrastructure will be funded, how levels of affordable housing will be achieved and can this be achieved at appropriate densities	13	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. Since the publication of the mayoral review, OPDC has been undertaking a series of activities to address the issues raised. OPDC reports to every Board meeting updating on progress against the mayoral review outcomes. OPDC's Local Plan is supported by a Whole Plan Viability Study and Affordable Housing Viability Assessment which assesses the viability of development in planning terms. OPDC recognises in Policy DI1 that not all infrastructure will be funded by Section 106 and CIL contributions and OPDC is proactively looking at alternative funding sources.
G43	General	Engagement on Reg 19 Local Plan has been inadequate because it ran through the summer and limited engagement took place	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Officers undertook a lengthy consultation exercise as part of the public consultation on the Regulation 19 Local Plan. The document was consulted on for 11 weeks - well in excess of the 6 week requirement outlined in OPDC's Statement of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Community Involvement. This extended consultation was to take account of the fact that the document was being consulted on during the summer. OPDC also offered extensions to the consultation to consultees who requested an extension. Officers hosted 6x1.5 hour drop-in sessions, consisting of a presentation and question and answer session. Officers also hosted two live Twitter sessions. Prior to consultation, officers also hosted two presentation events, to provide community groups with an overview of the results and key changes resulting from the Regulation 18 consultation and to inform stakeholders of the content of the Regulation 19 Local Plan and how stakeholders should respond to the consultation. During the consultation, emails to OPDC officers were responded to as soon as was practicable. The consultation activities associated with the Regulation 19 Local Plan exceeded nationally set requirements and OPDC's own Statement of Community Involvement requirements. Further details on OPDC's engagement activities in respect of the Local Plan can be found elsewhere in this Statement of Consultation document.
G44	General	Profits from developers and the development of the public sector land should be used to address the significant dis-	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The use of profits from developments on public sector land is not a matter that needs to be set out in the Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		benefits which displaced businesses, enterprises and impacted residents will experience		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G45	General	OPDC should maintain a public land property register	1	Pentecostal City Mission	No change proposed. Details of land ownership can be obtained from the land registry. The need for OPDC to hold such information is not a matter that needs to be dealt with as part of the Local Plan
G46	General	Hythe Road and Old Oak Common Lane Stations are not yet committed and so should be referred to as "potential stations".	1	Transport for London (Group Planning)	Change proposed. References to the Hythe Road and Old Oak Common Lane Overground Stations will be referred to as proposed stations here and throughout the Local Plan.
G47	General	Support the Friends of Wormwood Scrubs submissions	13	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G48	General	Oppose description of Old Oak as "one London's most inaccessible areas".	1	Robert Covell	No change proposed. This is quoting OPDC's corporate objectives. Figure 7.10 in the transport chapter shows that parts of the OPDC area are within the most inaccessible locations in London, having a PTAL of 0.
G49	Para 1.22	Planning Policy cannot be used to impose requirements on HS2 Station design or works beyond that set out in the HS2 Act	1	HS2 Ltd	Noted. The requirements of the London - West Midlands Act are set out in the Introduction chapter and in the Old Oak Common Station cluster.
G50	Para 1.21	Support chapters 3,4 and 11 being considered strategic policies for neighbourhood planning purposes	1	Transport for London	Noted.
G51	Para 1.21	Disagree that the Local Plan should set out which are and which are not strategic policies. Particularly disagree with the place policies as being strategic policies	13	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. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
G52	Para 1.23	It is not clear from the Local Plan or from Schedule 17 of the HS2 Act how the structural design of the Old Oak Common station will be decided upon.	1	West London Line Group	Noted. Schedule 17 matters relate mostly to the external appearance of proposals and their impacts on the surrounding context. Matters relating to the structural design are governed through the High Speed Rail (London- West Midlands) Act (2017). The station design will be carried out in accordance with HS2 technical standards, supplemented by British standards, Eurocodes and Network Rail standards. HS2's consultants will demonstrate and validate the design through the technical assurance process and will certify the design for the acceptance of HS2.

2. Spatial Vision

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SV1	Spatial Vision	Development should create an inclusive, thoughtfully designed green community	12	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. These aspirations are embedded within the spatial vision.
SV2	Spatial Vision	The Plan needs to address how to balance global city development values with local neighbourhood aspirations	13	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. The spatial vision recognises the local aspirations and role the area can play at a more strategic level on the 'thinking big' and 'going local' narratives.
SV3	Opportunities and challenges	The plan does not mention the negative aspects of early delivery such as there being current unpleasant uses that will not support good policy outcomes and causes	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. The impacts of delivery and construction are both recognised as key challenges in the opportunities and challenges element of the spatial vision. Individual applications are considered against relevant development plan policies. If proposals do not

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
			Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	adequately mitigate impacts of current uses, they would be refused planning permission.
SV4	Spatial Vision	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the plan strikes the right balance between ambitious and aspiration, but at the same time deliverable.
SV5	Figure 2.2	1	Deloitte LLP (on behalf of Diageo)	No change proposed. The identified area is publicly accessible open space and it is not appropriate to identify it as a residential area.
SV6	Narrative 9	1	The Inland Waterways Association-Middlesex Branch	Noted.
SV7	Figure 2.1	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the section of Higher Density Development within figure 2.1 should provide broad descriptions of the potential impacts related to high density development. Detailed points about high density development and impacts on the Grand Union

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
				Canal are picked up in the Grand Union Canal place policy.	
SV8	Figure 2.1	Provide reference to Healthy Streets approach.	1	Transport for London (Group Planning)	Change proposed. Healthy Streets has been included under the Health and Wellbeing section of figure 2.1.
SV9	Figure 2.1	Reference to MTS mode share targets and traffic reduction strategies to help minimise the use of private car should be made.	1	Transport for London (Group Planning)	Change proposed. References to mode share targets and traffic reduction strategies have been added to the Transit Orientated Development section of figure 2.1.
SV10	Spatial Vision	Spatial Vision narrative is unsound (no reason given why not)	1	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
SV11	Narrative 9	Spatial Vision narrative on environmental and heritage assets is unsound	1	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
SV12	Narrative 15	Spatial Vision narrative on day-to-day quality of life is unsound	1	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
SV13	Spatial Vision	Support Spatial Vision's specific reference to excellence in health and wellbeing.	1	Sport England	Noted.
SV14	Spatial Vision	General support for spatial vision	20	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis, Old Oak Park Limited, Fruition Properties, Chris Billington, A Somefun,	Noted.

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
			Hammersmith Society, Harlesden Lets, 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		
SV15	Figure 2.1	Should note the benefits of a new bridge link connection Willesden Junction Station to EMR site.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. OPDC considers that figure 2.1 should provide broad descriptions of the opportunities and challenges in delivering the spatial vision. Policy P11 sets out the connectivity benefits for a bridge connecting Old Oak North to Willesden Junction.
SV16	Figure 2.1	Support reference to enhanced access to Wormwood Scrubs for all Londoners.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
SV17	Figure 2.1	Section should highlight the opportunities for early delivery across the area.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Change proposed. Text has been added to the end of the final sentence of the Place Making section of figure 2.1.
SV18	Spatial Vision	Agree that area is nationally important and connected location and high standards in sustainability and design	1	Association for Consultancy and Engineering (ACE)	Noted.

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
SV19	Figure 2.1	Decision on Elizabeth Line Depot will affect adjacent delivery sites. This should be acknowledged as a challenge. Plan does not identify solutions for managing construction	1	Old Oak Park Limited	No change proposed. The challenges relating to development of the Elizabeth Line Depot are set out until the Deliverability section of figure 2.1. Managing construction is dealt with through a series of policies in the Local Plan, including SP10, T8 and EU7 and EU8.
SV20	Narrative 13	Include explicit reference to integrate with the Kensal Canalside Opportunity Area immediately to the East of the OPDC or a reference to link to, “new and existing local communities and neighbourhoods in the surrounding areas...”	1	Royal Borough of Kensington and Chelsea	Change proposed. Narrative 13 has been amended.
SV21	Spatial Vision	Welcome ambitious vision. References to ‘High quality’ should be given strong definition in policies, measurable specific targets, and relevant key performance indicators to clarify OPDC’s expectations, and to define what ‘success’ will look like.	1	Environment Agency	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.
SV22	Spatial Vision	Supports the OPDC’s acknowledgements about the Park Royal Industrial Estate	1	Segro	Noted.
SV23	Spatial Vision	Supports the distinctive roles of Park Royal and Old Oak in	1	Segro	Noted.

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
		achieving this in delivering high density and mixed use community			
SV24	Narrative 4	Spatial Vision narrative 4 is sound.	2	Darren Milne, Kevin Early	Noted.
SV25	Spatial Vision	Too many hot food takeaway shops are having a detrimental effect on health of pupils.	1	Ark Burlington danes Academy	Noted. Policy TCC2 provides guidance for managing hot food takeaways
SV26	Narrative 1	Spatial Vision narrative 1 is sound.	1	Kevin Early	Noted.
SV27	Narrative 10	Spatial Vision narrative 10 is sound.	1	Kevin Early	Noted.
SV28	Spatial Vision	Spatial vision is legally compliant and complies with Duty to Cooperate requirement.	1	Torquil Law	Noted.
SV29	Spatial Vision	Spatial vision is positively prepared and legally compliant. (No justification provided)	1	Raymond Gill	Noted.
SV30	Spatial Vision	Spatial Vision is not effective due to the lack of emphasis on people.	1	Friary Park Preservation Group	No change proposed. OPDC considers that the Spatial Vision and 'Going Local' narratives provide appropriate focus on improving life changes, fairness and day to day quality of life for local people.
SV31	Narrative 9	Spatial Vision narrative 9 is unsound	2	Friary Park Preservation Group, Sarah Abrahart	No change proposed. OPDC considers this narrative to be sound.

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
SV32	Narrative 11	Lack of precise information on the funding of new homes makes this narrative unsound	1	Friary Park Preservation Group	No change proposed. It is not considered appropriate to provide specific clarity on funding arrangements for the delivery of housing here. Funding of housing is provided via a wide variety of sources and it is not the role of the spatial vision to set these out.
SV33	Narrative 12	Spatial Vision narrative is unsound due to the reliance on flawed, conventional, economic forecasting.	1	Friary Park Preservation Group	No change proposed. OPDC considers this narrative to be sound based on robust economic evidence base provided in the Whole Plan Viability Assessment.
SV34	Narrative 13	Spatial Vision narrative 13 is not effective	1	Friary Park Preservation Group	No change proposed. OPDC consider this narrative to be effective.
SV35	Narrative 14	Spatial Vision narrative for life chances and fairness is excessively positive and unsound.	1	Friary Park Preservation Group	No change proposed. OPDC consider this narrative to be sound.
SV36	Narrative 6	We are a local school who have done a lot of work to improve the health of pupils. New development in the area should not undermine this.	1	West Twyford Primary School	Noted.
SV37	Narrative 1	High quality design that lasts and ages well is important.	1	A Somefun	Noted.
SV38	Narrative 5	Concerns about ecological affects on Wormwood Scrubs if access is not suitably controlled.	1	Chloe Fremantle	Noted. Policies related to Wormwood Scrubs are provided in P12. Policies relating to managing the natural environment are provided in Policy SP8 and in the Environment and Utilities Chapter.

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
SV39	Narrative 5	Wormwood Scrubs to be excluded from the OPDC area.	1	Sarah Abrahamart	No change proposed. Wormwood Scrubs was included in the OPDC boundary on designation of the Corporation on 1 April 2015.
SV40	Narrative 10	Spatial Vision narrative 10 is unsound.	1	Sarah Abrahamart	No change proposed. OPDC considers this narrative to be sound.
SV41	Spatial Vision	Spatial Vision should refer to Park Royal as destination.	1	David Craine	No change proposed. Narrative 3 identifies the whole of the OPDC area to be a destination for London and the UK.
SV42	Narrative 3	Transport hub should be a place they want to go and not just pass through.	1	David Craine	Noted. Policies SP1 and P1C1 reflects this aspiration.
SV43	Narrative 11	New homes should be affordable to local people.	1	David Craine	Noted. Policy H1 sets out that OPDC will work with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London. OPDC also has an Affordable Housing Nominations policy for affordable rented and intermediate homes, that prioritises allocations to local people.
SV44	Narrative 12	Local people should have a tangible sense of benefiting from new development.	1	David Craine	Noted. Narrative 12 sets this aspiration to be delivered through the policies of the Local Plan.
SV45	Narrative 13	Spatial Vision will the help to mitigate risk of local people feeling disconnected from new development.	1	David Craine	Noted.
SV46	Spatial Vision	Support vision, but densities should not necessarily be high density	1	ArtWest	No change proposed. To deliver the development targets set out in the London Plan development within Old Oak and Park Royal will need to be high density. London Plan and Local

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
				Plan policies provide guidance to ensure high density development is high quality.	
SV47	Spatial Vision	Need to balance protection of existing facilities and land uses, and delivery of housing, employment, social infrastructure, green space and amenities to serve local needs	13	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. Policies SP4, H5, E1, EU1 and TCC4 provide guidance for protecting and managing existing land uses and facilities. This is appropriately reflected in the Spatial Vision Narratives.
SV48	Spatial Vision	The plan should push best practice in sustainability	13	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. The Spatial Vision seeks to pioneer international excellence in sustainability and this is reflected through a series of policies in the Local Plan.
SV49	Spatial Vision	Alternative Vision and Objectives suggested by the Hammersmith Society is still relevant	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted. The Community-led vision and objectives submitted with the Regulation 18 consultation responses have been embedded within the amended Spatial Vision, narratives and policies.

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response	
			Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton		
SV50	Spatial Vision	Need to provide for a diverse mix and pioneer rather than be a continuation of things that have gone before	1	Harlesden Lets	Noted. The Spatial Vision seeks to ensure the OPDC area will be home to a diverse mix of uses, places and people that pioneers international excellence.
SV51	Spatial Vision	Residential figures have increased, there is less open space and high densities.	1	Regents Network	No change proposed. Residential development capacity has been identified using National Planning Practice Guidance methodologies. This is also accompanied by increased open space requirements of 30% of developable land outside of SIL to be delivered as publicly accessible open space.
SV52	Spatial Vision	Cannot define any part of the area as a neighbourhood as it will be dominated by mega development with no sense of community.	1	Regents Network	No change proposed. London Plan and Local Plan policies provide guidance to ensure the deliver of Lifetime Neighbourhoods and a high quality built environment.
SV53	Figure 2.2	Westway Circus station should be shown on this map	1	West London Line Group	No change proposed. Figure 2.2 depicts existing stations and proposed new stations within the OPDC area. As such OPDC considers its inclusion would not be appropriate.
SC54	Spatial Vision	The 'thinking big' and 'going local' narratives are inherently conflicted with one another	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. OPDC considers the two scales of narratives complement each other. This is reflected in the IIA.

Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
			Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

3. Strategic policies

General comment

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP0	ALL	Support the Strategic policies	1	Association for Consultancy and Engineering (ACE)	Noted.

Strategic Policy SP1: Catalyst for Growth

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP1/1	SP1	Support policy SP1	4	Imperial College, T.A.S.B. Investments Ltd, Association for Consultancy and Engineering (ACE), Hammersmith and Fulham Council	Noted.
SP1/2	SP1, Para 3.8	Support para 3.8	3	Imperial College, Hammersmith and Fulham Council, ArtWest	Noted.
SP1/3	SP1, Figure 3.1	Need to amend the figure to change the label of the line to Watford from 'West London Line' to 'London Overground'	1	Transport for London	Change proposed. The figure has been amended to change titling the line as 'West London Line' to 'London Overground' and the 'West London Line' titling has been moved lower down on the image to the correct location.
SP1/4	SP1, Para 3.8, bullet 3	The wording of the Local Plan should reflect the	1	Transport for London	Change proposed. Wording has been inserted to recognise that feasibility work into the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		uncertainties of the delivery of an Elizabeth Line station at Kensal Canalside and that feasibility work is underway			delivery of Kensal Canalside station is underway.
SP1/5	SP1, Figure 3.3	The new Overground stations at Hythe Road and Old Oak Common Lane should be removed from this image which shows existing context	1	Transport for London	Change proposed. This map is an existing context map so it is inappropriate for it to show the proposed overground stations and these have therefore been removed.
SP1/6	SP1	The potential for early interim catalysts for growth should be acknowledged in the Policy and the supporting text	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The potential for catalyst uses is referenced in Policy SP6 (Connecting People and Places). It is considered that it would result in unwarranted repetition to also include it here.
SP1/7	SP1, Para 3.5	There is a typo. 'benifits' should read 'benefits'	1	Royal Borough of Kensington and Chelsea	Change proposed. The typo has been corrected.
SP1/8	SP1	Para 3.8 refers to the need to ensure any impacts on surrounding town centres are mitigated, but this should be amended to require no detrimental impacts. This requirement should also be reflected in Policy SP6.	1	Royal Borough of Kensington and Chelsea	Change proposed. The wording has been revised to reflect the wording in the NPPF requiring proposals to not result in significant adverse impacts (para 27). This wording has also been carried across into the lead in to policy TCC1.
SP1/9	SP1	Policy should reflect that the rail interchange is being built in an area of deprivation which poses challenges for balancing the needs of	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Recognition that the development is being built within a deprived part of London is set out in the supporting text to SP1 and it is felt that this text, along with other text in the policy and supporting text, recognise the need to balance the needs of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		existing residents with that of new arrivals		Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	existing communities with those of new arrivals.
SP1/10	SP1	New development is likely to result in rising rent levels in Harlesden, impacting further on the deprivation of the area.	1	Harlesden Lets	No change proposed. A lack of new housing being built is likely to have a similar or worse effect on house prices in Harlesden. There is a need to build new housing in London to meet needs.
SP1/11	SP1	Policy asserts that regeneration will bring benefits to surrounding areas but other policies in the Local Plan do not guarantee this will be the case.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the Local Plan's policies will bring benefits to surrounding communities - this will include new transport infrastructure, homes, jobs and ancillary uses. The Integrated Impact Assessment has assessed the impact of the Local Plan's policies and this shows that the policies will deliver significant benefits to surrounding areas
SP1/12	SP1	Should re-order the policy so that the larger points (new part of London) are reviewed higher than the more detailed points (deliver a new transport super-hub).	1	West London Line Group	No change proposed. OPDC does not consider that the ordering of the policy is a matter that affects the soundness of the policy and therefore does not propose to amend its ordering.
SP1/13	SP1, para 3.2	Paragraph should reference that it is important that the station also include strong	1	West London Line Group	No change proposed. The need for the station to be adequately embedded in the public realm, to allow for the movement of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		links to other public transport, particularly local rail services.			passengers to other transport modes is covered in Policy P1C1.
SP1/14	SP1, para 3.8	Should make reference to the proposed Westway Circus London Overground station	1	West London Line Group	No change proposed. This is not a committed scheme, is not supported by TfL and is not within the OPDC area so there is not a need to make reference to this proposal.

Strategic Policy SP2: Good Growth

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/1	SP2	There is no mention of how you plan to reduce pollution levels	1	Robert Covell	No change proposed. The Local Plan sets out a series of measures aimed at reducing pollution levels. This includes, inter alia, prioritising more sustainable modes of transport, in accordance with Policy SP7, requiring development to protect existing and provide new green infrastructure in accordance with SP8, requiring development to deliver an overall improvement in air quality in accordance with Policy EU4, requiring development to meet or exceed on-site carbon emissions targets set out in the London Plan in accordance with Policy EU9 and supporting the Circular and Sharing Economy, in accordance with Policy EU7
SP2/2	SP2	Support Policy SP2	5	Mayor of London, T.A.S.B. Investments Ltd, Association for	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Consultancy and Engineering (ACE), A40 Data Centre B.V, Hammersmith and Fulham Council	
SP2/3	SP2	The good growth policy should reference the transport principles of good growth which are set out in the Mayor's draft Transport Strategy.	1	Transport for London	No change proposed. The good growth policy in OPDC's Local Plan is specific to OPDC whereas the Mayor's Transport Strategy principles are specific to the Mayor's Transport Strategy. It is therefore not considered appropriate to reference these in OPDC's Good Growth policy in the Local Plan.
SP2/4	SP2	Should avoid reference in para 3.11 to hard to define concepts such as community cohesion and empowerment, safety and security and respect of diversity	1	Old Oak Park Ltd	No change proposed. This text is quoting the principles of lifetime neighbourhoods as defined in DCLG's 'Lifetime Neighbourhoods' document.
SP2/5	SP2, Para 3.13	Para 3.13 should recognise that not all sites in Park Royal will be suitable for SIL uses above two storeys	1	A40 Data Centre B.V	No change proposed. The Park Royal Intensification Study identifies different approaches to intensification, some of which would could be achieved by in-fill development and would not require increased building heights. Para 3.32 of the Local Plan identifies that opportunities to intensify Park Royal should be taken, where feasible, recognising that now all sites in Park Royal will be suitable for intensification.
SP2/6	SP2	Support SP2b)	1	Environment Agency	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/7	SP2	Should consider if there is a suitable monitoring indicator for good growth	1	Hammersmith and Fulham Council	Change proposed. The KPIs have been updated to include monitoring indicators for all strategic policies.
SP2/8	SP2	Support SP2d)	1	ArtWest	Noted.
SP2/9	SP2	SP2 is not sound because it is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. OPDC does not consider that Policy SP2 is unsound. It is not made clear how specifically Policy SP2 is not meeting objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so. SP2 does not directly deal with objectively assessed needs, which predominantly relates to housing targets. Housing targets are dealt with in Policy SP4.
SP2/10	SP2	Do not consider SP2 to be the most appropriate strategy and that an alternative strategy would be more successful and more sustainable	14	St Quintin and Woodlands Neighbourhood Forum, 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. OPDC considers Policy SP2 to be the most appropriate strategy to support the sustainable regeneration of the area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/11	SP2	The plan needs to recognise the need for flexibility to respond and adapt to change	13	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. The need for flexibility in design is recognised in Policy SP2. Where appropriate, particularly where evidence is more detailed and proposals are likely to come forward sooner, the Local Plan provides greater detail, but where development is not likely to come forward for a significant amount of time and where there are a number of potential design approaches to support the sustainable regeneration of the area, the Local Plan has been drafted with the need for greater flexibility in mind.
SP2/12	SP2	There is a mismatch between quantity and quality, between the ambitions for good growth and the densities being proposed	14	Hammersmith Society, 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. OPDC considers that the densities proposed are consistent with the principles of good growth. the Local Plan shows that the future public transport access will create a highly accessible part of London. OPDC considers it appropriate and both consistent with the NPPF and in general conformity with the London Plan to promote high density development in this location. A series of policies in the Local Plan aim to ensure that where high density development is proposed, in delivers development of a high quality, which appropriately addresses issues such as, inter alia, context and townscape (SP9), access and inclusivity (D2), amenity (D6), open space provision (EU1), air quality (EU4) and noise and vibration (EU5).

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/13	SP2	Technology might improve efficiency, but will not produce better quality	13	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 does not propose to amend its approach to designing, constructing and managing a smart and resilient city as outlined in SP2.
SP2/14	SP2, 3.10	Need to set out the evidence lies behind the simplistic assertion that 'through high density, transit oriented development the greatest sustainability benefits can be realised'. While the present London Plan reflects a policy of building at higher densities near public transport nodes, the concept that Londoners either wish or need to live in extreme 'super-densities' in tall buildings around railway stations has not gone unchallenged in recent years.	13	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	Change proposed. It is a well understood planning principle that high density development should be delivered in the areas of high public transport access. This helps to reduce journeys by less sustainable transport modes and reduces the need for urban sprawl. There is a need to ensure appropriate quality to this form of development, which the Local Plan policies have sought to achieve. However, the text has been amended to 'some of' to note that there may be some strands of sustainability may not realise the greatest benefits through transit orientated development.
SP2/15	SP2	Support SP2g)	1	Harlesden Lets	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/16	SP2	Should promote off-site modular construction.	1	Harlesden Lets	Noted. Off-site modular construction is supported within policy SP2 (advanced construction).
SP2/17	SP2	Good growth is a nebulous concept and its attributes lack precision and measurability.	13	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 good growth policy is a high level strategic policy. Its measurable attributes are embedded throughout the more detailed other strategic and development management policies in the Local Plan. The Local Plan is also supported by Key Performance Indicators relating to Good Growth.
SP2/18	SP2	Policy should give greater steer on how to create exemplary developments	13	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 Local Plan provides detailed policies on how development will be anticipated to deliver exemplary developments.

Strategic Policy SP3: Improving Health and Reducing Health Inequalities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP3/1	SP3	Policies need to reflect that there is a high level of deprivation and obesity in the area	1	NHS Brent CCG,	No change proposed. The high levels of deprivation and obesity in the local area are referenced in Figure A1.9 in the appendix. Policy SP3 recognises the need for the development of the area to assist in improving health and tackling health inequalities. The requirements of SP3 are delivered through a series of policies in the Local Plan that address open space and play space provision, indoor daylight and sunlight standards, outdoor impacts such as wind, noise and air quality and policies aimed at reducing pollution, such as SP7 (connecting people and places) and EU9 (minimising carbon emissions and overheating). The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study, incorporating SA/SEA requirements.
SP3/2	SP3	Support approach to and recognition of importance of health and well-being	1	Sport England	Noted.
SP3/3	SP3	The healthy streets approach should be recognised as a core element to this policy and reference to T1 should be made in the supporting text.	1	Transport for London	Change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. However, reference has been made to how healthy streets can contribute to a healthy outdoor environment in the supporting text. The policy links box includes the transport chapter, in recognition

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					that the requirements set out in the transport chapter have a relation to improving health and reducing health inequalities. This is not limited to the Healthy Streets Approach and also relates to issues such as controlling car parking and promoting electric vehicle charging and promoting the movement of freight and construction materials by rail and the canal. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/4	SP3	Support Policy SP3	16	Sport England, Hammersmith and Fulham Council, West Twyford Primary School, Hammersmith Society	Noted.
SP3/5	SP3	Policy SP3 should acknowledge the role that sport and leisure activities can play in supporting health and well-being.	1	Sport England	No change proposed. There are a number of determinants of good or poor health and well-being and all cannot all be referenced in this policy or in supporting text. The policy links box includes the environment and utilities and town centre and community uses chapters, in recognition that the requirements set out in these chapters, which includes access to sports and leisure activities, has a relation to improving health and reducing health inequalities. The health impacts of the Local Plan's policies have also been assessed as an

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					integral part of the Integrated Impact Assessment supporting study.
SP3/6	SP3	Whilst OPDC was not successful in its bid to be a Healthy New Town, a set of principles could be developed and included in Policy SP3 that set out how the OPDC area will deliver innovation and best practice in health and well-being outcomes	1	Healthy Urban Development Unit	No change proposed. There are a multitude of determinants of health and there are a range of policies throughout the Local Plan aimed at improving health and reducing health inequalities. OPDC considers that all these would support the area being developed as a Healthy New Town, in spirit if not in designation. It is not considered appropriate to repeat these policy requirements under Policy SP3.
SP3/7	SP3	the policy could make reference to the need to address adverse environmental impacts and link to policy EU4, EU5 and EU13	1	Healthy Urban Development Unit	Change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. However, reference has been made to how environmental impacts should be addressed in the outdoor environment. The policy links box includes the environment and utilities chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/8	SP3	Need to recognise the need for coordinating construction activities and mitigation	1	Healthy Urban Development Unit	No change proposed. The requirements for coordinating construction activities and ensuring appropriate mitigation measures are

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		measures to minimise the impact on existing and future communities			covered elsewhere in the Local Plan in policies SP10 and T8.
SP3/9	SP3	Support requirement for Health Impact Assessments	1	Healthy Urban Development Unit	Noted.
SP3/10	SP3	The supporting text could also refer to the role that EIAs play in addressing human health issues	1	Healthy Urban Development Unit	No change proposed. The need to produce Environmental Impact Assessments (EIAs) is governed by separate legislation. It is not felt necessary to identify that such assessments consider human health impacts. Such assessments also assess development impacts on other aspects and it is considered that if reference is made in SP3 to human health being a consideration within EIAs, other elements of the document would need to make reference to the other aspects dealt with in an EIA, adding unwarranted factual detail to the Local Plan.
SP3/11	SP3	North Pole Road is dominated by cheap confectionary, discounted alcohol and multipacks. Someone needs to take control of the High Street and improve local residents' health	1	Ark Burlington Danes Academy	Noted. North Pole Road is outside of the OPDC area but OPDC is looking to control uses that impact on health within the OPDC such as hot-food takeaways, betting shops, amusement arcades and pay-day loan shops. This is dealt with in Policy TCC2. Issues such as the availability of confectionary and discounted alcohol fall outside of the remit of planning.
SP3/12	SP3	Projections for improving health are excessively	1	Friary Park Preservation Group	No change proposed. OPDC considers that the application of the policy within SP3 and the application of other policies within the plan will

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		positive and are therefore unsound			help to ensure that develop does help to improve health and reduce health inequalities.
SP3/13	SP3	The establishment of a Low Emissions Neighbourhood discussed in para 6.47 should be incorporated as a policy requirement in SP3.	6	Wells House Road Residents Association, Joanna Betts, Francis, Mark and Caroline Sauzier, Lily Gray, Catherine Sookha, Thomas Dyton	No change proposed. OPDC are in discussions about the potential designation of a Low Emissions Neighbourhood (LEN) within the OPDC area. Any designation would need to undergo a separate decision process, within OPDC and TfL and therefore cannot be made a policy requirement through this Local Plan. In addition, air quality matters are one of many determinants of health. Policy SP3 is a high level strategic policy addressing determinants of health in a rounded manner. It is not felt appropriate to address specific air quality matters here, and that instead, these matters should be appropriately addressed in the air quality policy.
SP3/14	SP3	Policy SP3 references that most people spend their times indoors, but consideration should also be given to air quality issues outdoors in specific areas used by vulnerable groups such as children (play space) and the elderly (open space in general)	6	Wells House Road Residents Association, Joanna Betts, Francis, Mark and Caroline Sauzier, Lily Gray, Catherine Sookha, Thomas Dyton	No change proposed. Consideration has been given to the outdoor environment - this is set out in the preceding paragraph to the paragraph dealing with the indoor environment. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. The policy links box includes the environment and utilities and design chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. This includes policy EU4 on air quality, policy EU1 on open

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					space and policy D9 on play space. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/154	SP3	Policy as it stands is unjustified as it does not set out how positive health outcomes will be achieved through other strategic and more detailed policies.	13	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. OPDC considers that the Local Plan policies will support the reduction of health inequalities and the delivery of improved health. There are a number of facets to this, dealt with across a number of policies throughout the plan. In broad terms, it includes, inter alia, delivering new housing to meet a range of needs, delivering new jobs across a range of sectors and skills levels, delivering new transport infrastructure that prioritises sustainable transport modes and delivering a high quality place, with consideration given to amenity, air quality and ensuring adequate access to open space and town centre and community facilities to meet needs.
SP3/16	SP3	The design, size and practicality of living accommodation should also be considered as an important factor impacting on health and well-being.	1	Harlesden Lets	No change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. The policy links box includes the housing chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. This includes policy H3 on housing mix, which requires self-contained housing to meet London Plan and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					national housing space standards and that requires 90% of homes to meet Building Regulation M4(2) and 10% to meet M4(3). The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/17	SP3	Well-being can reduce the costs in health-care, crime and public resources	1	Harlesden Lets	Noted.
SP3/18	SP3	The proposals for high densities and tall buildings contradicts the desire for a healthy environment	1	Harlesden Lets	No change proposed. OPDC disagrees that support for tall buildings necessarily negatively impacts on the creation of a healthy environment. The policies in the Local Plan require that development ensures high standards of design of tall buildings. Relevant policies include SP9, D4, D5, D6 and D8, amongst many others.
SP3/19	SP3	The policy is silent on a number of key issues that have significant impact on health and health inequalities including air quality (with the exception of indoor air quality mentioned in 3.22), overcrowded homes and gypsy and travellers' accommodation. Further detail should be added and the policy should require	14	Harlesden Lets, 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. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. Air quality is referenced in relation to indoor air quality as noted but text has now been inserted referencing air quality in relation to the outdoor environment. The policy links box includes the housing chapter that includes policies on gypsies and travellers and which includes policies for the delivery of new homes to address the chronic demand for new housing

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		proposals to support reducing these specific existing health inequalities.			in London. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/20	SP3	The Local Plan should recognise overcrowding as having a negative impact on health and well-being and set out how this is being addressed	14	Harlesden Lets, 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. There are a number of determinants of good or poor health and well-being and all cannot all be referenced in this policy or in supporting text. The Local Plan includes policies aimed at tackling overcrowding, particularly by seeking to increase housing supply and provide a range of housing types and tenures (Policy SP4).
SP3/21	SP3	Healthy streets will encourage active lifestyles	1	Association for Consultancy and Engineering (ACE)	Change proposed. Wording has been inserted to recognise the benefits of healthy streets to health and well-being.

Strategic Policy SP4: Thriving Communities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/1	SP4	Do not consider Policy SP4 on Thriving Communities to be 'positively prepared' in respect of the housing element of these policies and based on a strategy which seeks to meet	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Forum, Wells House Road Residents Association,	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red-line boundary as would usually

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development		Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF and existing guidance on assessing housing need in strategic housing market assessments. Based on a current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). However, as Opportunity Areas identified in the London Plan with the capacity to provide at least 25,500 homes, Old Oak and Park Royal can also help to meet city-wide housing need. The Development Capacity Study is part of the evidence base of this Local Plan identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and also help meet strategic London-wide housing need. OPDC considers it is a sound approach to meet local

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					objectively assessed needs and fulfil a role in meeting the needs of the host local authorities and the wider London area. The targets in OPDC's Local Plan are considered to be in general conformity with the Mayor's London Plan targets for the area.
SP4/2	SP4	Support aims of policy, but encourage OPDC to work with partners to enable early delivery.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted.
SP4/3	SP4	Overall supports delivery of much needed housing and associated social infrastructure but suggests that more housing could be delivered. More information could be provided in the Local Plan on how OPDC will influence/encourage delivery.	1	Association for Consultancy and Engineering (ACE)	No change proposed. As outlined in SP10, OPDC's Development Capacity Study has assessed the capacity for new homes in the area. This is reflected in OPDC's housing targets. Timing and phasing is critical to the delivery of OPDC's housing targets. OPDC's Absorption Rate Study has assessed typical delivery rates across large regeneration schemes in London over recent years, and has concluded, given the scale of the site, that there are multiple delivery markets within Old Oak and Park Royal that means that the housing targets may be delivered. In addition, OPDC has carried out a Social Infrastructure Study to identify the social infrastructure requirements for the area. The Delivery and Implementation Chapter 11 details how as a proactive planning authority, OPDC will support the timely delivery of new homes and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					optimised phasing to meet, and where possible, exceed the housing targets.
SP4/4	SP4	Projections for thriving communities seem excessively positive and therefore unsound.	1	Friary Park Preservation Group	No change proposed. This strategic policy aims to promote lifetime neighbourhoods, social cohesion and the integration of new and existing communities through the delivery of new homes to meet housing needs along with new social infrastructure.
SP4/5	SP4	There is no justification for an 'objectively-assessed need' for 24,000 new homes at Old Oak.	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red-line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the OPDC area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). The Development Capacity Study identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					assessed housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and as Opportunity Areas help meet strategic London-wide housing need.
SP4/6	SP4	OPDC has not considered an alternative vision with a lower housing target for Old Oak which would be significantly more successful and sustainable.	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The legal requirement is to test 'reasonable' alternatives that are sufficiently distinct to enable their meaningful comparison. The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015.

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					The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. It should be noted that LBHF's Issues and Options consultation was undertaken in advance of the consultation on and publication of the Mayor's Old Oak and Park Royal Opportunity Area Planning Framework and in advance of the publication of the London Plan (2015).
SP4/7	SP4, para 3.97	The housing targets are based on the land that is available for development. This involves rafting over areas that may be too difficult and expensive.	13	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 Development Capacity Study has assessed the capacity for new homes in the area. The challenges of delivering this, including relocating, reconfiguring and decking over a number of large-scale operations are referenced in the supporting text for Policy SP10.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/8	SP4	The housing targets should be reduced to be consistent with the 'central' classification in the London Plan or the plan should be found unsound.	13	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. In light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs. Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) supports development in these areas to exceed the defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) states that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). Policy SP9 in this Local Plan requires development to respond to local character and context but 'reflecting' local context would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities and tall buildings. The draft London Plan 2017

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					removes the density matrix and instead requires a design-led approach that optimises densities.
SP4/9	SP4	Policy SP4 promotes lifetime neighbourhoods, social cohesion and the integration of new and existing communities. Policy SP4ii is of no direct relevance to the achievement of this objective and should be deleted as a sub-clause.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The regeneration of Old Oak and Park Royal can play an important role in meeting both local objectively assessed need and London-wide housing need. In creating a new part of London, a whole range of new homes will be delivered to meet a diverse housing need, including private sale, affordable, built-to-rent and specialist homes, all provided as part of a mixed and balanced community with lifetime neighbourhoods as envisaged in the Thriving Communities Policy.
SP4/10	SP4	Encouraged by the proposed range of housing types.	1	Harlesden Lets	Noted.
SP4/11	SP4	As part of the strategic policy for housing there should be a mix of housing types but with the overwhelming priority on social rented housing at rents that people on low incomes can afford.	1	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing tenures, types and sizes that deliver mixed and inclusive communities and help meet local and London-wide need. Chapter 8, and particularly Policy H2, detail the requirements for different types of affordable housing, including London Affordable Rent (based on target rents, formerly known as social rent). The tenure requirements are in accordance with the Mayor of London's Affordable Housing and Viability SPG (2017) and the draft London Plan 2017.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/12	SP4	Diversity in design should be recognised so that apartments, houses, town houses, mansion blocks as well as dwellings for elderly residents and easily-adaptable homes for disabled people are all part of the mix.	1	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing types and sizes that deliver mixed and inclusive communities. Policy H3 states that housing should be flexibly designed and adaptable. Policy H9 supports the delivery of specialist housing to meet the needs of older people and other people with specialist housing needs, such as people with physical disabilities.
SP4/13	SP4	SP4(a)i should be amended to: 'homes that provide a proportionate level of all types of homes to meet objectively assessed need (as required by the NPPF) which will positively contribute to meeting London-wide need'.	13	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 to policy. However, some additional text has been added to the supporting text which clarifies that the overall capacity of the development will enable OPDC to meet its objectively assessed need as well as contribute towards meeting London-wide housing need.
SP4/14	SP4	The OPDC's evidence base does not provide evidence to support delivery of a 50% affordable housing target.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs for market and affordable housing in the local housing market area. As set out in the Housing Evidence Statement, according to OPDC's Strategic Housing Market Assessment (SHMA), there is a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	45% affordable housing need in the area. As Opportunity Areas, Old Oak and Park Royal can also help to meet city-wide housing need. The latest 2017 GLA SHMA published along with the Draft London Plan identifies that London's affordable housing need has increased to 65 per cent because needs have not been met. Therefore a 50 per cent affordable housing target for OPDC is considered to be appropriate for the following reasons: The Draft London Plan 2017 specifies an overarching 50% affordable housing target; including 50 per cent affordable housing for public sector land, Strategic Industrial Locations, and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The Mayor's draft Housing Strategy also sets a target for Mayoral organisations for an average of 50 per cent of homes on land brought forward under the current administration to be affordable. An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded that: 70% of the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. Accordingly, it is considered that this provides evidence to support a 50% affordable housing target for OPDC.
SP4/15	SP4	The proposed tenure split will not meet the objectively assessed housing need.	13	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 strategic policy refers to OPDC's overarching 50% affordable housing target. However, some supporting text has been added to clarify that the quantum of housing enables OPDC to meet its objectively assessed need. Details on housing tenure are contained in Policy H2.
SP4/16	SP4	Add after 'population', 'of all ages, abilities/disabilities and income' (to ensure delivery of mixed and inclusive communities).	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. Policy SP9a)vi) sets out how the built environment will be required to demonstrate a high standard of accessible and inclusive design. Policy D3 sets out more details of requirements for accessible and inclusive development that is compliant with the latest guidance and deliver design

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	solutions that meet the requirements of all users.
SP4/17	SP4	Add (c) securing delivery of active community involvement and ownership.	13	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 DI3d) supports community ownership and management programmes. It is not considered necessary to repeat this in this strategic policy.
SP4/18	SP4	Add (d) delivering tangible and measurable benefit to existing deprived and excluded community members in surrounding neighbourhoods.	13	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 main focus of this policy is homes and infrastructure and integration of new and existing communities. The spatial vision and strategic policies as a whole describe how the regeneration of Old Oak and Park Royal can benefit existing deprived communities in surrounding neighbourhoods. Figure 2.1 in the Spatial Vision provides a summary of the opportunities to create a socially, environmentally and economically sustainable community in Old Oak and Park Royal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/19	SP4	Support for the aspiration to deliver the amount of homes to meet a range of needs and in fact more homes could be delivered to meet the housing need, subject to infrastructure and viability considerations	1	Association for Consultancy and Engineering (ACE)	Noted. The housing targets are minimum targets.

Strategic Policy SP5: Economic Resilience

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP5/1	SP5	Not clear how jobs figures have been calculated and need to do further work to understand what jobs are likely to be attracted to what sectors and how this will benefit local employment	1	Michael Hangyal	No change proposed. The Local Plan is supported by a Development Capacity Study which sets out how the jobs figures have been calculated. The Future Employment Growth Sectors Study also accompanied the Plan and this identified the sectors likely to grow in the Old Oak and Park Royal area. It would not be appropriate for the Plan to identify how many jobs will be delivered in each economic sector as this would be inflexible to changing economic cycles and trends. Policy E5 requires relevant developments to help local people benefit from employment opportunities.
SP5/2	SP5	The Plan should identify where the intensification of industrial land should occur and should be less about	2	Ealing Council, Segro	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		protection and more about a proactive strategy for delivery of growth. This should also consider decant arrangements.			identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.
SP5/3	SP5	The plan should have a fall back position in case of slower economic growth, with lower jobs targets	1	Hammersmith Society	No change proposed. The Local Plan covers 20 years over which there will be economic peaks and troughs. It is not considered appropriate to assume a significant economic downturn from the outset of the Local Plan. The Local Plan is accompanied by a set of Key Performance Indicators (KPIs). If Plan targets are not being achieved, this would be identified through these KPIs and this may trigger a review of the Plan's policies to either ensure the jobs targets are met or to revise them down accordingly.
SP5/4	SP5	In the right location and with the right design and planning controls, SIL uses can be located next to non SIL Uses	1	A40 Data Centre B.V	No change proposed. The Mayor's London Plan sets out the strategic approach to promoting and managing industrial land, including defining which uses are appropriate within Strategic Industrial Locations (SIL). In line with the Industrial Land Review, OPDC's key priorities for SIL are to protect, strengthen and intensify industrial activities. To ensure these objectives are met, development will only be permitted if it does not materially affect the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					ongoing functioning of employment uses in line with policy D6.
SP5/5	SP5	Object to London Living Wage being referenced in the policy. It is not the role of the planning system to control workers' pay and conditions	1	DP9 (on behalf of Old Oak Park Limited)	No change proposed. The policy 'strongly encourages' contractors and building occupiers to sign up to the London Living Wage. The London Living Wage is recognised as a key method of addressing in-work poverty and is therefore a key facet of ensuring economic resilience. Wording has been inserted to reference that this requirement would be secured through an informative on planning decisions.
SP5/6	SP5	Latest version of the Local Plan (Fig 3.4) correctly indicates a site which is in residential use, which was erroneous in the Reg 18 Local Plan	1	Boyer Planning (on behalf of Raban Goodhall Ltd)	Noted.
SP5/7	SP5	Site currently designated as SIL should be identified for development	1	Boyer Planning (on behalf of Raban Goodhall Ltd)	Change proposed. The Industrial Land Review and Addendum have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
SP5/8	SP5	More flexibility is required in the SIL area to allow for mixed use development in SIL around residential areas (i.e. railway cottages and		Nicky Guymer; Bruce Stevenson; Oonagh Heron; Mark Walker; Dave Turner; TITRA; Midland Terrace Residents; Nye Jones; DP9	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the ongoing

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Midland Terrace) on Old Oak side of the development zone.		(on behalf of A40 Data Centre BV); Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Ralph Scully; Catherine Sookha; Lynette Hollender; Jeremy Aspinall; Thomas Dyton	demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.
SP5/9	SP5	Policies are over restrictive in terms of their protection of SIL, more flexibility is required across SIL (Park Royal West and Old Park Royal)	15	Old Oak Neighbourhood Interim Forum; TITRA, Midland Terrace Residents; Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. The London Plan provides strategic protection to SIL and defines which uses are appropriate in these areas. A more flexible approach in designated SIL would not be in general conformity with these policies.
SP5/10	SP5	Support protection, intensification and strengthening of Park Royal SIL.	1	CBRE (on behalf of SEGRO); GLA	Noted.
SP5/11	SP5	Support the creation of new jobs, including fairer economy, optimising employment opportunities for	16	LBHF; Hammersmith Society; Harlesden Lets, Wells House Road Residents Association,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		local residents and working with training and educational institutions.		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	
SP5/12	SP5	Support for creative sector and the provision of new workspaces, including creative low cost workspaces.		ArtWest; ACAVA; Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Grand Union Alliance; Jeremy Aspinall; Thomas Dyton;	Noted.
SP5/13	SP5	Policy should reference all of the relevant evidence base. Failure to reference relevant evidence base calls into question the transparency of the consultation process.	13	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,	Change proposed. Additional supporting text has been added to policy E1, drawing on information from the Industrial Land Review, referring to the area of existing industrial land affected.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP5/14	SP5	The delivery of small workspaces and flexible workspaces will be hampered by plans to protect, strengthen and intensify the Strategic Industrial Location (SIL) in Park Royal.	16	Old Oak Neighbourhood Interim Forum; TITRA; Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is considered that protecting, intensifying and strengthening Park Royal will not compromise the implementation of policy E3. Protecting and intensifying SIL will ensure that industrial floorspace is available to help meet demand. This floorspace can be used to accommodate small businesses and a range of broad industrial type activities.
SP5/15	SP5	Support encouragement of London Living Wage, but also need to think about need to provide housing for those on the London Living Wage	1	Harlesden Lets	Noted. Delivering affordable housing in a range of tenures, types and sizes is a key objective of the Local Plan as set out in Policies SP4 and H2.
SP5/16	SP5	More detail is needed on how Industrial intensification will be delivered.		London Borough of Ealing	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					windfall sites could also contribute towards intensification and policy E1 would support this.
SP5/17	SP5	Question whether industrial intensification is achievable.		DP9 (on behalf of A40 Data Centre BV); Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Jeremy Aspinall; Thomas Dyton; Grand Union Alliance; Old Oak Interim Forum	Change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.
SP5/18	SP5	Not convinced that that sites identified in the intensification study are sufficient to meet demand for industrial space.		Park Royal Business Group	Change proposed. The new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification and co-location of industrial floorspace.
SP5/19	SP5	Industrial land is important to London's economy and productivity, but it is facing		CBRE (on behalf of SEGRO)	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		structural changes and challenges. Urban logistics is a key element of London's industrial sector and is critical to its productivity and economic success.			
SP5/20	SP5	Support intensification but challenges linked to intensification need to be addressed and it needs be grounded in the needs of the market and subject to viability.		Park Royal Business Group; CBRE (on behalf of SEGRO)	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as site allocations. The Place Policies and Transport policies also seek to address some of the key challenges linked to intensification including improvements to the movement network.
SP5/21	SP5	The Plan should be clearer in setting out how SIL intensification will be delivered, including identifying site allocations for industrial intensification.	1	Mayor of London	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP5/22	SP5	Recognise that more efficient use of land through intensification is required and broadly support recommendations for this.	1	Park Royal Business Group	Noted.
SP5/23	SP5	A bold shift in policy and approach is needed to actively promote and facilitate new industrial development under a clearly defined spatial vision.	1	CBRE	Noted. OPDC considers that the policies in the Local Plan seeks to achieve this.
SP5/24	SP5	Site currently designated as SIL should be identified for development	1	Boyer Planning (on behalf of Raban Goodhall Ltd)	Change proposed. The Industrial Land Review and Addendum have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
SP5/25	SP5	Question the deliverability/accuracy of jobs targets as the figures do not take into account the closure and relocation of businesses/jobs.	14	Hammersmith Society; Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The jobs capacity figure is based on a robust assessment of the development potential of suitable sites and broad locations over the plan period. Detailed information on the assessment is set out in the Development Capacity Study and the Park Royal Intensification Study. However, the text has been amended to clarify that the targets refer to new jobs.

Strategic Policy SP6: Places and Destinations

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP6/1	SP6	Support SP6 and recognition of the role catalyst uses can play	1	Imperial College	Noted.
SP6/2	SP6	Support Policy SP6	4	T.A.S.B. Investments Ltd, Association for Consultancy and Engineering (ACE), Hammersmith and Fulham Council, Friary Park Preservation Group	Noted.
SP6/3	SP6, Para 3.53	Para 3.53 erroneously refers to 'Atlas Junction stations' rather than 'Atlas Junction centres'	1	Transport for London	Change proposed. The text has been amended to 'centres'.
SP6/4	SP6	The supporting text to SP6 should refer to the role the Oaklands development will play in early delivery and integrating existing and new communities at Atlas Junction.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. It is not felt appropriate in this strategic policy to draw out and identify one particular scheme. Reference is made to the Oaklands scheme supporting the knitting together the area in the supporting text to the Atlas Junction cluster (Policy P8C1).
SP6/5	SP6	Support the delivery of Old Oak High Street as a major town centre	1	Mayor of London	Noted.
SP6/6	SP6	Support the introduction of a separate place for Willesden Junction	1	Old Oak Park Ltd	Noted.
SP6/7	SP6	Para 3.51 refers to setting the trajectory of the centre. The	1	Old Oak Park Ltd	No change proposed. OPDC considers it important to set the trajectory now so that

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		trajectory should not be set now as there will be many influences and considerations that warrant a more flexible approach			individual schemes that come forward can be assessed against the understanding of the likely emergence of the wider centre. The rationale for this is set out in OPDC's Retail and Leisure Needs Study and this approach has been supported by the Mayor of London.
SP6/8	SP6	Should include requirement for 'high quality' in the policy and recognise role of local heritage in place-making.	1	Hammersmith and Fulham Council	Change proposed. Wording has been added to part a)i) of the policy to reference 'high quality' and it is considered that the inclusion of high quality within this policy line also binds the other requirements in the policy to contribute towards the creation of high quality places. Reference to heritage informing the creation of distinctive places is already made in the supporting text to Policy SP6.
SP6/9	SP6	Policy SP6 is not sound (no reason given)	1	Sarah Abraham	No change proposed. Without a reason being given for why the policy is not sound, OPDC is unable to address this issue.
SP6/10	SP6	Support creation of a cultural quarter.	15	Mayor of London, ArtWest, 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP6/11	SP6	Policy should set out that each centre should be appropriate to its function and should establish its own identity	13	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. The policy defines the function of each of the centres and requires proposals to support their delivery. The policy also requires development to support the delivery of a series of distinctive places. OPDC considers that the policy therefore addresses this matter.
SP6/12	SP6	Question the concept of clusters which the text states are characterised as locations which are likely to attract higher footfall and/or have a particular use and as such warrant more detailed policy	13	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. Cluster policies are considered necessary to provide extra policy detail at the points in the area where most activity is likely to occur. Responses to the Regulation 18 Local Plan identified and supported the need within certain locations for a greater degree of policy detail.
SP6/13	SP6	The word 'celebrate' does not mean anything in spatial planning terms.	13	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,	No change proposed. The word celebrate is only ever used in supporting text rather than in policy. The Oxford Dictionary defines that 'celebrate' can be to 'honour or praise publicly' and in the instances it is used in the Local Plan, the word relates to the aspiration for development to create a feature of a particular asset.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP6/14	SP6	SP6a)ii) is not justified	13	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. No reason has been provided as to why the policy is not justified. More detailed policies are included in the Local Plan relating to meanwhile and catalyst uses (TCC8 and TCC9) which will be used to assess the acceptability of any proposals.
SP6/15	SP6	SP6 should specifically include – delivery of positive physical and community connections between existing places within and adjacent to the OPDC area, specifically avoiding detrimental impact and segregation.	13	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. Physical connections are dealt with in SP7 (connecting people and places) and in the relevant place policies and therefore do not need to be included in SP6. Community connections are dealt with in a general sense in SP4 (thriving communities) and therefore do not need to be included in SP6.
SP6/16	SP6	SP6 should provide policy that ensures a cultural quarter and catalyst use achieves positive regeneration within an	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. The strategic policy is strategic in nature. Policy TCC5 requires that facilities for cultural space meet needs. Likewise, Policy TCC8 requires proposals to perform positively against the criteria within Table 10.2,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		existing relatively deprived area. Proposals should be drawn up in collaboration with local community members and be widely consulted.		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	which includes that it should complement London and West London's needs and growth aspirations and complement the local characteristics and meet the needs of and provide benefits for the local population.
SP6/17	SP6	The policy should also actively support proposals for community empowerment and ownership – across boundaries of the OPDC area and neighbouring areas	13	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. Community ownership is dealt with under Policy DI3. Community empowerment is dealt with under the lifetime neighbourhoods principles, which are extolled through Policy SP2. OPDC cannot set planning policies to address the delivery of development outside of its boundary.
SP6/18	SP6	Old Oak should be promoted as a cultural destination with a facility that will attract people from across the country	1	Jamie Glazebrook	Noted. This is included within SP6.
SP6/19	SP6	Support provision of a mix of culture and leisure uses in the development	1	David Craine	Noted.
SP6/20	SP6	Development needs to complement Harlesden Town Centre, rather than compete and overwhelm it.	1	Harlesden Lets	Noted. The requirement to complement neighbouring centres is set out in Policy SP6. OPDC also requires schemes over a certain scale to measures that will support the continuing vitality and viability of Harlesden

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					District Centre. Details for this strategy are set out in Policy TCC1.
SP6/21	SP6	Support designation of Old Oak High Street as a major town centre	1	Royal Borough of Kensington and Chelsea	Noted.
SP6/22	SP6	The cultural quarter should include an arts centre and studio space for the local community.	1	Chloe Freemantle	Noted. The provision of a cultural quarter would enable the potential provision of an arts centre and studio space.

Strategic Policy SP7: Connecting People and Places

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/1	SP7	Wormwood Scrubs Street should not be open to traffic. Its role should be clarified.	16	Old Oak Interim Neighbourhood Forum, TITRA; Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. The intention is that Wormwood Scrubs Street is for pedestrians, cyclist and access only vehicles to reduce demand along this east-west route.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/2	SP7	The proposed Old Oak High Street is not deliverable and would have a negative impact on the Birchwood Nature Reserve and Canal. Park Road should be main north south route in the development area. Early delivery of the High Street will not be possible. The High Street will be series of disconnected streets.	1	The Inland Waterways Association-Middlesex Branch	Change proposed. The alignment of Old Oak High Street, now named Old Oak Street, has been revised, in recognition of the longer-term deliverability of the Elizabeth Line depots but there is a still a longer term aspiration to deliver a connection over the canal in this location. The Birchwood Nature Reserve and Canal will be protected.
SP7/3	SP7	The number of bridge crossings over the canal should be minimised. This number of crossings in a short distance will compromise the proposed linear park.	1	The Inland Waterways Association-Middlesex Branch	Change proposed. Policy SP8 along with policy EU1 and EU2 all promote the requirements for open space and urban greening. OPDC believe that additional bridges will ensure that better connections are made to the linear park, promoting its use for more vulnerable road users. One bridge connection has been removed due to work showing the feasibility of a hybrid bridge solution for an eastern connection over the Grand Union Canal.
SP7/4	SP7	Welcome text supporting water borne movement, including freight, on the canal.	1	The Inland Waterways Association-Middlesex Branch	Noted. No change proposed.
SP7/5	SP7	Public transport should be provided with the same level of priority as pedestrians and cyclists in transport hierarchy.	1	TfL	No change proposed. OPDC see clear merit in producing a robust hierarchy to influence user behaviour and identify the core principles for healthy streets. This starts with

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					identifying the most vulnerable road uses and ensuring that infrastructure and options are available to encourage sustainable travel behaviour across the site.
SP7/6	SP7	Policy T4 on mode shift and parking should be included in SP7 as they are strategic policy matters.	1	TfL	No Change proposed. SP7 already covers the need to minimise journeys by private car and to encourage walking, cycling and public transport use which will lead to modal shift. Specific car parking standards are considered a development management issue and not appropriate for inclusion in a strategic policy.
SP7/7	SP7	TfL recommends that Policy b) part iv could be strengthened; beyond minimising the need for use of private vehicles, OPDC should actively discourage their use including through the respective Borough traffic reduction strategies, consistent with the draft MTS.	1	TfL	Change proposed. OPDC has strengthened the policy
SP7/8	SP7	The need to improve safety, accessibility, connectivity and permeability should be included in SP7 as they are key mayoral transport policies.	1	TfL	Change proposed. Text has been amended to add this requirement.
SP7/9	SP7	Reference to Crossrail on map should be amended to Elizabeth Line.	1	TfL	Change Proposed. The map has been amended to say the Elizabeth Line.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/10	SP7	Consistent colours and terminology should be used on all maps.	1	TfL	Change proposed. Figures have been updated and consistent colours and terminology have been used.
SP7/11	SP7	The form and function of Park Road needs to be clarified because currently it is not clear from the policy and work has been undertaken on this which is at odds.	2	TfL and Old Oak Park Ltd	Change proposed. The text for the form and function of Park Road has been amended to reflect recent transport and masterplanning work undertaken for the Old Oak North Development Framework Principles. This detail will be clarified in SP7 and further provided in P2.
SP7/12	SP7	Policy should mention the role of facilitating and managing efficient servicing and delivery activities.	1	TfL	No change proposed. The policy references the need for efficient servicing of land uses and servicing and delivery activities are outlined in detail in Policy T7.
SP7/13	SP7	Supporting text should acknowledge potential for early delivery of a new bridge link from EMR to an improved Willesden Junction Station.	1	HGH Planning on behalf of Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. This link forms part of Old Oak Street in the local plan. Within P2 the supporting text discusses the aspiration for the early delivery of this link.
SP7/14	SP7	Acknowledge that early delivery can happen due to construction of first part of Park Road at Oaklands South	1	HGH Planning on behalf of Genesis	No change proposed. The timing of Park Road is provided in the IDP and the site allocation information is provided within SP10. This is sufficient information for the Local Plan.
SP7/15	SP7	Figure 3.8 and 4.12 indicate different forms of vehicular links from Scrubs Lane. This needs to be amended in line with the transport and masterplan work that has been undertaken	1	Old Oak Park Limited	Change Proposed. OPDC has amended the figures to ensure they are accurate and consistent.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/16	SP7	Support for connectivity	1	NHS London Healthy Urban Development Unit	Noted. No change proposed.
SP7/17	SP7	Support Scrubs Lane as an important location for early development	1	DP9 on behalf of Fruition properties	Noted. No change proposed.
SP7/18	SP7	The Council welcomes working with the OPDC to improve the connections between the OPDC area and the adjoining Kensal Canalside Opportunity Area. Needs to be in text for SP7.	1	RB Kensington and Chelsea	No change proposed. Reference to connections to Kensal Canalside are made in the supporting text to SP1.
SP7/19	SP7	Support policy. The need to work with a number of stakeholders in order to deliver infrastructure should be reflected in the policy and the policy wording should be ambitious- i.e. 'sufficient' infrastructure isn't ambitious enough.	1	LB Hammersmith and Fulham	No change proposed. The need to work with a number of stakeholders is captured as a policy in DI2.
SP7/20	SP7	Paragraph deals with the need for transport infrastructure to seamlessly integrate into the development.	1	LB Hammersmith and Fulham	Noted. No change proposed.
SP7/21	SP7	LBHF is keen to continue to work with OPDC to understand and mitigate the impact of development upon LBHF residents and the local road network.	1	LB Hammersmith and Fulham	Noted. No change proposed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/22	SP7	3.76 should also reflect the sensitive nature of the Grand Union Canal as a nature and conservation site that will be a key feature for the future of this development.	1	LB Hammersmith and Fulham	No change proposed- SP8 outlines this as a key point and expands on the subject.
SP7/23	SP7	Policy is sound	1	Friary Park Preservation Group	Noted. No change proposed.
SP7/24	SP7	Support the Sustainable Transport Hierarchy	1	Brent Cyclists	Noted. No change proposed.
SP7/25	SP7	There is a risk that new routes within the development will affect safety on roads outside of the development must be mitigated against. Roads through the development should have no through route for traffic.	1	Brent Cyclists	No change proposed. SP7 and the relevant place policies indicate the need for roads within the development to be designed to not encourage through traffic and the importance of new and existing roads being designed according to the Healthy Streets approach.
SP7/26	SP7	Health Streets principles must be delivered on all new streets.	1	Brent Cyclists	Noted. Policy SP7 and T1 promote this. No change proposed.
SP7/27	SP7	Concern that the High Street will be built to narrowest allowable width within guidelines.	1	Brent Cyclists	Noted. OPDC intend for Old Oak Street to have a generous width to cater for all users and be resilient to future transport changes. No change proposed.
SP7/28	SP7	Development should mitigate turbulence for road users where it occurs.	1	Brent Cyclists	Noted. No change proposed.
SP7/29	SP7	Support aim to prevent through road for private vehicles.	1	Brent Cyclists	Noted. No change proposed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/30	SP7	Aim for "specific character and function" must not impact on walking and cycling safety.	1	Brent Cyclists	Noted. In line with the sustainable transport hierarchy, walking and cycling will be at the forefront of the design of streets. No change proposed.
SP7/31	SP7	Canal freight transport must not impact pedestrian and cycle movements along canal.	1	Brent Cyclists	Noted. If moorings on the canal are introduced, they will be designed to ensure they do not impede walking and cycling movements to adhere to the sustainable transport hierarchy. No change proposed.
SP7/32	SP7	Policy will help mitigate risk of traffic congestion.	1	David Craine	Noted. No change proposed.
SP7/33	SP7	Important to develop walkable neighbourhoods and a sustainable movement network within the Opportunity Area and connecting neighbouring communities	13	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. In line with the sustainable transport hierarchy, walking and cycling will be at the forefront of the design of streets. No change proposed.
SP7/34	SP7	The plan does not adequately address how rail and bus connections will be delivered to serve the area	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. The rail figure with Policy T5 indicates the rail connections and stations that will be available to serve the development area. The bus figure within Policy T6 shows the bus network which will serve the area. Infrastructure requirements are also set out in OPDC's Infrastructure Delivery Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/35	SP7	Support delivery of Old Oak High Street	13	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.
SP7/36	SP7	There is not a proposal to provide a transport link between each of the 'Places'. This will be particularly important to interconnect key residential areas with the major elements of Social Infrastructure, if in the case of medical and educational facilities, these are to be centralised. A unified transport system covering each of main streets shown on Figure 3.8 – Proposed Connections, would be a good starting point.	13	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. The transport networks are shown in the figures associated with policies T2, T3, T5 and T6 and in the Infrastructure Delivery Plan have been developed to ensure there are connections between all of the "Places".
SP7/37	SP7	Need to recognise that the area is not flat	13	Hammersmith Society, Wells House Road	No change proposed. OPDC recognises that there are significant level challenges across

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	the site. All walking and cycling networks will have a minimum of 1 in 20 gradient to ensure the site is accessible.
SP7/38	SP7	The plan should not be considered positively prepared unless it includes a plan for an internal transit system.	13	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. SP7 and the transport policies indicate the proposals for the transport network across Old Oak and Park Royal, which provides for a variety of means of travel across the area.
SP7/39	SP7	Policy is not positively prepared as it does not adequately promote modal shift from car use, and text should be added to require the active marketing of public transport in new development to rectify this.	1	John Cox	No change proposed. The Local Plan promotes modal shift from car use by ensuring the healthy streets approach is the overarching policy for all transport proposals. T4 promotes low and car free development. SP7, T 1, T2, T5 and T6 promote walking, cycling and public transport use.
SP7/40	SP7	Policy SP7 is too detailed and it is questionable whether it should be a strategic policy.	13	Old Oak Interim Neighbourhood Forum, Wells House Road	No change proposed. Policy SP7 outlines the wider plans across the area to connect people and places. It is appropriate as a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents Association, 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	Strategic Policy as it deals with the overarching aims to ensure good connectivity across the area. The Places and transport policies then provide more detail.
SP7/41	SP7	Support minimising need to travel but this cannot be achieved by resisting mixed use on strategic industrial location.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.
SP7/42	SP7	Need to recognise that passage along new streets may not be straightforward	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. OPDC aims to deliver high quality, legible streets to ease navigation.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/43	SP7	Walking distances between the stations are excessive compared to most transport interchanges.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan shows the connections between stations which will be as direct as possible. A range of modes will be available for people to have choice with regards to the way they interchange between stations.
SP7/44	SP7	Allowing mixed use development in SIL would have a positive impact on travel patterns.	14	TITRA; Midland Terrace, 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 Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.
SP7/45	SP7	Plan for categories of users with different needs and travel objectives	13	Grand Union Alliance, Wells House Road Residents Association,	No change proposed. The Sustainable Transport Hierachy and Healthy Streets policies in SP7 and T1 promote sustainable

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	travel and includes choice for travellers with different needs.
SP7/46	SP7	Transport improvements should be part of a clear masterplanned approach	13	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.
SP7/47	SP7	Old Oak Common Station must have east west access	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is promoting east-west access at Old Oak Common station as indicated in the network figures in SP7 and the transport chapter. OPDC is promoting this and working with HS2 Ltd to deliver this.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/48	SP7	Scale and the proposals for the A40 and A406 need outlining.	13	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. Both the A40 and A406 are strategic roads and under TfL's jurisdiction. The A40 study is provided as a supporting study to the local plan which outlines the proposals that were investigated by TfL.
SP7/49	SP7	Park Royal transport improvements are required and provision of grade separation is not the answer.	13	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. Grade separation is not a proposal being investigated by OPDC for Park Royal. The Park Royal Transport Strategy is provided as a supporting study and outlines the transport proposals that have been investigated. Required improvements are referenced in OPDC's Local Plan and in the Infrastructure Delivery Plan.
SP7/50	SP7	Deliverability of Old Oak High Street if Elizabeth Line Depot is retained during plan period	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Change proposed. The Local Plan no longer shows the Elizabeth Line depot as being a development site within the plan period but OPDC will work with Crossrail to investigate future connections across the Elizabeth Line depot.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/51	SP7	Lack of precedents for similar scale car free developments.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No Change proposed. OPDC is encouraging car-free development to ensure people travel sustainably. There are a number of precedents for car free developments in King's Cross, Vauxhall and Stratford.
SP7/52	SP7	Innovative scenarios should be considered and made publicly available.	13	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 key policy in SP7 and T1 is to ensure streets are future-proofed for changes in the surrounding context, life-style and technological changes. Innovative transport interventions like autonomated vehicles and drones will be investigated for Old Oak and Park Royal when more information is known about them.
SP7/53	SP7	Align transport policies with those of boroughs, Transport for London and other transport operators to reduce existing congestion in the surrounding road network.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No Change Proposed. OPDC worked collaboratively with TfL, Network Rail, HS2 Ltd and the local boroughs to ensure the transport policies were aligned.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/54	SP7	Coordination of proposals and discussions with communities for walking and cycling improvements should be carried out.	13	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. Consultation has been undertaken as part of the Local Plan and engagement will be undertaken as part of future planning applications.
SP7/55	SP7	Refer to HS2-WLL link and raft	1	West London Line Group	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan
SP7/56	SP7	Refer to conference/exhibition/performance facility above the raft	1	West London Line Group	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan. However, the Local Plan supports the potential for catalyst uses, which could include a convention facility, subject to the proposal according with other relevant planning policy.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/57	SP7	Seamless interchange will not be delivered and OPDC must meet the ever growing demand for rail in general and especially between these three facilities (Clapham Junction, Heathrow and OOC).	1	West London Line Group	Noted. OPDC is working with Network Rail, TfL, DfT and HS2 Ltd to create a high quality interchange between all stations in Old Oak and Park Royal.
SP7/58	SP7	Support the principle of healthy streets however connection to overground stations will be windy	1	West London Line Group	Noted. Policy D6 requires consideration to be given to amenity, which includes wind.
SP7/59	SP7	Objections to the Old Oak Common Lane station bridge	15	Old Oak Interim Forum and TITRA and Midland Terrace, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan shows an east-west connection between North Acton and the OOC station via the Overground station. Technical work undertaken by TfL indicated this connection should be a bridge. The connection is currently unfunded and further work is required to understand the form of it that will be delivered.
SP7/60	SP7	Concern regarding the position of Old Oak High Street and it not adequately serving Harlesden Town Centre/ removing activity on Station Road and to the west of Willesden Junction station routing up to Harlesden.	1	London Borough of Brent	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/61	SP7	Request for early delivery of enhancements to Willesden Junction station and connections	3	LBB, LBHF, HGH Planning on behalf of Queens Park Rangers Football Association and Stadium capital	No change proposed. OPDC shares the aspiration to enhance Willesden Junction station and deliver connections at the earliest opportunity. This will require collaborative working with landowners, TfL and Network Rail
SP7/62	SP7	Support the emphasis on the sustainable transport hierarchy and requirement for use of consolidation centres where appropriate. Would encourage OPDC to identify how consolidation centres may be phased across the area.	1	LWARB	No Change Proposed. OPDC does not consider it appropriate to allocate a site as a consolidation centre at this point in time. OPDC requests developers to explore the opportunity to use existing consolidation centres as part of their construction logistics plan.
SP7/63	SP7	Improvements in public transport and improved cycle and walking infrastructure is required to encourage modal shift.	1	Park Royal Business Group	Noted. This is supported in OPDC's sustainable transport hierarchy and the Local Plan sets out the infrastructure enhancements required to help support this modal shift.
SP7/64	SP7	Welcome acceptance that better transport solutions are required to support Park Royal.	1	Park Royal Business Group	Noted.
SP7/65	SP7	Accessible, efficient and affordable public transport spreading out from transport hubs should be a priority to minimise traffic congestion and to promote OPDC's policy of 'no cars'.	1	West Twyford Residents Association	Noted. It is agreed that public transport should be prioritised over private vehicular movements along with the promotion of active transport including walking and cycling.
SP7/66	SP7	The Local Plan does not give recognition of the fact that the new	13	Old Oak Interim Neighbourhood Forum,	No change proposed. Both SP7 and the transport chapter indicate the need for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		homes and jobs are being implanted in an area of London where the road and public transport networks are under pressure		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	enhanced infrastructure and to alleviate congestion in order to cater for the transport demands generated by the development.

Strategic Policy SP8: Green Infrastructure and Open Space

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP8/1	SP8	Welcome the positively planned approach to green infrastructure	1	Mayor of London	Noted
SP8/2	SP8	OPDC should refer to engaging closely with neighbouring London Boroughs, on the basis of a duty to co-operate, to ensure that the quality of the “wider environment”, including green and open spaces, is not negatively impacted by any nearby developments.	13	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 Duty to Cooperate is a statutory duty during plan-making. OPDC has produced a Duty to Cooperate Statement as a supporting study to the Local Plan which sets out the how and when OPDC has engaged with proscribed bodies in the production of the Local Plan. Details on OPDC's approach to the Duty to Cooperate is also included in the supporting text to DI3 and in the annex to the Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP8/3	SP8	Diageo considers that the Lakeside Drive site could provide new open space and could be shown on figure 3.11. The diagram should also indicate the existing open space around the Diageo lake within the First Central development.	1	Diageo Plc	No change proposed. The Lakeside Drive site is located between a road and a logistics operation. It ranges in width from 19 metres to 22 metres and is considered to be of sufficient width to provide a range of development typologies and to be deliverable. OPDC does not consider it appropriate through the Local Plan to designate the site as an open space to offset the loss of public open space elsewhere. In accordance with Policy EU1, a proposal would need to come forward and propose any off-set and include measures to ensure that any replacement open space is of an equal or better quantum, quality and access and replaces the lost open space's function.
SP8/4	SP8	The diagram should also indicate the existing open space around the Diageo lake within the First Central development.	13	Friends of WWS, 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 existing open space in this location is not publicly accessible. The figure here only shows publicly accessible open space so it is not appropriate for this open space to be shown in the figure.
SP8/5	SP8	In reference to figure 3.11, suggest that the proposed GUC Linear Park should stretch along both the southern and northern	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Securing linear space along the northern edge will be challenging within Park Royal SIL. The proposal is however to provide off-side public open space on Old Oak and in the Channel Gate place.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		boundary of the canal for its entire length			
SP8/6	SP8	Welcome the 30% for open space. Suggest that the indicative areas of search for the new parks illustrated in Figure 3.11 are further refined and supported in Chapter 4. Requirements of the Water Framework Directive should be mentioned.	1	Environment Agency	Change proposed. At this stage it is too early to further refine the exact areas that will be allocated for parks and green spaces. However, further work has been undertaken in Old Oak North to refine the locations of public open spaces in this place. The supporting text to Policy EU3 reference to the Water Framework Directive. The place policies in chapter 4 appropriately reflect the need for the delivery of these local parks.
SP8/7	SP8	Broadly support the policy to provide 30% open space but want to ensure it is achieved.	15	LBHF, 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.
SP8/8	SP8	Policy is unsound because it doesn't address monitoring	1	Friary Park Preservation Group	No change proposed. OPDC has a set of key performance indicators which include for delivery of or loss of green infrastructure
SP8/9	SP8	Exclude WWS from Local Plan and provide more open space within OO.	1	Sarah Abrahamart	No change proposed. Wormwood Scrubs forms part of the OPDC area for planning purposes and therefore must appear in the Local Plan. OPDC is aware of the need to preserve

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Wormwood Scrubs and ensure its long-term role as an important area of MOL that is accessible and open to all the community. OPDC have carried out extensive work to understand how much open space is required to support the new development and is consulting on this provision. The proposal is to include a wide range of public open spaces to accommodate the different needs of the community including provision of 3 local parks and 30% public open space.
SP8/10	SP8	Support provision of 3 new local parks, but clarify funding, ownership and management in Local Plan.	13	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. Funding will be secured through a variety of sources in accordance with Policy DI1. OPDC recognises that securing funding for management and maintenance of green spaces is important. Funding mechanisms however will vary across the area and will be subject to negotiations and agreement with a number of parties. OPDC therefore do not consider that it is appropriate to include this in the Local Plan.
SP8/11	SP8	Ensure developers contribute fully to the open space provision	13	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. These detailed requirements are covered in Policy EU1.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
SP8/12	SP8	Canal forms an important part of the open space network - refer to comment in Places section	13	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 Grand Union Canal is referenced in the policy.
SP8/13	SP8	Railway embankments should be recognised as part of the open space network	13	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. Noted. Figure 6.3 in policy EU2 identifies sites of importance for nature conservation including railway embankments. The policy recognises the importance of these area and protects them or requires adequate compensatory provision if they are removed.
SP8/14	SP8	Cemeteries should not be regarded as meeting developers open space requirements	13	Hammersmith Society (Mark Walker), Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Noted. Policy EU1 sets out clear requirements for provision of open space. This policy does not support the use of cemeteries to offset their requirements. Policy EU2 protects existing areas of open space including cemeteries.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP8/15	SP8	Support open space target but it may impact on densities and affordable housing provision	13	Old Oak Interim Neighbourhood Forum (Mark Walker), TITRA (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 policy approach is supported by evidence in OPDC's Environmental Standards Study, which has benchmarked against other developments in London. The requirements for open space will need to be balanced against the requirements for affordable housing, in accordance with policy DI1 and any scheme would be assessed in terms of its impact on amenity and other environmental issues.
SP8/16	SP8	Ensure open space remains publicly accessible	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. This would be secured through legal agreements or condition.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP8/17	SP8	Green Infrastructure and Open Space Strategy and Management Plan lacks detail particularly around Green Space Factor and Green Points system implementation	13	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. The name has been changed to the Urban Green Factor in line with the new policy in the draft London Plan (2017). The London Plan provides guidance on the application of the Urban Greening Factor and further SPG is proposed by the Mayor on guidance and its application.
SP8/18	SP8	Work with the boroughs to create additional green infrastructure beyond the OPDC area	13	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 EU1 sets out clear requirements for provision of open space. OPDC will work with the host boroughs to support green space provision where feasible. However, OPDC is not the planning authority for the area outside of OPDC and therefore its role is more limited in terms of green infrastructure provision.
SP8/19	SP8	Lack of guidance for active play	1	Grand Union Alliance	Change proposed. Policy D9 provides guidance for multi-functional play. The supporting text has been strengthened to make reference to encouraging active lifestyles. Mayor policy also applies to the area. London Plan policy has not been repeated here and the Mayor's Play and Informal Recreation SPG also applies to the area.

Strategic Policy SP9: Built Environment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP9/1	SP9	There should be a hundred metre buffer between existing communities and new developments.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the need to deliver appropriate standards of amenity for existing residential areas as being an important component in the design and delivery of development proposals. These proposals will need to be considered on a case by case basis. As such Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
SP9/2	SP9	The document does not include a density map as per the 1st draft Local Plan. Should revert to having the density ranges that were in the Reg 18 draft Local Plan	13	Wells House Road Residents Association, Midland Terrace 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, St Quintin and Woodlands Neighbourhood Forum	Change proposed. Average density information has been provided within the supporting text to SP9. OPDC's Tall Building Statement provides information for the definition and location of tall buildings within the OPDC area.
SP9/3	SP9	Wish to be involved in the development of a list of community assets	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. Assets of Community Value are nominated by community groups and designated by the local Borough. Once

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	designated, ACVs can be considered as material considerations in planning decisions.
SP9/4	SP9	Wish for the area not to become an area of poor quality design	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC wishes to support the delivery of a high quality built environment. This is embedded in the Local Plan's Spatial Vision and Spatial Vision Narrative 1. To realise this aspiration, national guidance, London Plan policies and relevant Local Plan policies such as SP2, SP9, D1, D2, D4 and D5 will be implemented.
SP9/5	SP9	The densities proposed in the Local Plan exceed established guidelines. The Plan is therefore unsound.	13	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. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The draft London Plan does not include a density matrix as it has been recognised by the Mayor that it did not appropriately recognise local context. The draft London Plan policy D6 recognises that appropriate densities should be determined through consideration of the site context, access

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					to public transport accessibility and the capacity of surrounding infrastructure.
SP9/6	SP9	The plan is not specific about what are acceptable building heights or what is meant by tall buildings. Without this, the plan lacks transparency and therefore does not accord with the NPPF. The indicative densities are buried in the DCS and are not clearly set out in the Local Plan	14	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	<p>Change proposed. Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas.</p> <p>Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8(B) as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings, but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory.</p> <p>No change proposed. OPDC considers policies SP9 and D5 are consistent with the requirements of the NPPF.</p> <p>Density ranges are defined within the DCS to</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					define the development capacity of the OPDC area in accordance with national guidance. Policies SP9 and D5 provide guidance for the location of sensitive areas where densities and buildings should provide an appropriate response.
SP9/7	SP9	Support policies requiring development to respond to local context, in particular sensitive locations such as open spaces.	16	The Friends of Wormwood Scrubs, David Craine, ArtWest, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
SP9/8	SP9	Views from the Wormwood Scrubs should be given appropriate protection, and the Plan should clearly restrict building heights along the northern boundary of the scrubs.	14	The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. Policy D7 provides guidance for managing the impact of development proposals on views from Wormwood Scrubs. Local Plan policies SP9, D5, P1 and P1C1 alongside London Plan policy 7.7, national guidance provides guidance for the location of building heights along the southern edge of Old Oak South. Policy P1 identifies that tall buildings should be located around Old Oak Common Station with buildings heights

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	appropriately responding to Wormwood Scrubs as Metropolitan Open Land.
SP9/9	SP9	Welcome policies requiring development to respond to canal as sensitive location and heritage asset, but concerned this is not justified by evidence Grand Union Canal Massing and Enclosure Note.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 provides guidance for "delivering heights of generally 6 to 8 storeys" with "opportunities for tall buildings at key crossing points" along the Grand Union Canal. This is based on the recommendations of the Grand Union Canal Massing and Enclosure Note. This note considers enclosure of potential development at points along the canal. It recognises that enclosure is one element in guiding building heights alongside London Plan, Local Plan and national guidance. The recommendation of delivering a range of generally 6 to 8 storeys that is embedded in Policy P3 is considered to be sufficiently flexible to enable the delivery of heights above and below this range.
SP9/10	SP9	Midland Gate site should not be shown as existing residential area due to recent commercial use.	1	Castlepride Limited	Change proposed. Figure 3.14 has been amended to remove Midland Gate from the depicted residential area.
SP9/11	SP9	'Nationally listed' should be 'statutory listed'	1	London Borough of Ealing	Change proposed. Key for Figure 3.14 has been corrected to state Statutory Listed.
SP9/12	SP9	Support approach to design of the built environment to optimise wider benefits	1	Association for Consultancy and Engineering (ACE)	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP9/13	SP9	Europa Studios should not be identified as a non-designated heritage asset.	1	Old Oak Park Limited	Change proposed. To reflect its current status of not being on the Local Heritage Listings, Europa Studios has been removed as a Local Heritage Listings. However, this does not prevent it from being considered as a non-designated heritage asset.
SP9/14	SP9	Policy should state that if loss of assets is proposed then justification is required in accordance with policy D8	1	Old Oak Park Limited	No change proposed. This is dealt with in Policy D8 and OPDC does not consider it appropriate to repeat this here.
SP9/15	SP9	Agreement that development needs to be optimised	1	A40 Data Centre B.V	Noted.
SP9/16	SP9	Agreement that proposals should provide appropriate amenity	1	A40 Data Centre B.V	Noted.
SP/17	SP9	Refer to listed buildings in RBKC including Kensal House and Day Nursery and St Charles Hospital and Kensal Cemetery being a Grade 1 Listed Registered Park and Garden.	1	Royal Borough of Kensington and Chelsea	Change proposed. Kensal House and Day Nursery, St Charles Hospital have been depicted as Statutory Listed assets. Kensal Cemetery has been depicted as Grade 1 Listed Registered Park and Garden.
SP9/18	SP9	References to 'High quality' should be given strong definition in policies, measurable specific targets, and relevant key performance indicators to clarify OPDC's expectations, and to define what 'success' will look like	1	Environment Agency	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP9/19	SP9	Applicants should be aware of other proposals in development that are in proximity. Acknowledgement of this in para 3.93 would be beneficial to the built environment.	1	London Borough of Hammersmith and Fulham	Change proposed. Supporting text to SP9 has been amended to reflect cumulative impacts.
SP9/20	SP9	SP9 is sound, positively prepared and / or legally compliant.	3	Raymond Gill, Friary Park Preservation Group, A Somefun	Noted.
SP9/21	SP9	Policy is unsound (no reason given)	1	Sarah Abrahart	No change proposed. OPDC considers policy SP9 to be sound.
SP9/22	SP9	Densities are to high and exceed London Plan targets.	13	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. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The draft London Plan does not include a density matrix and requires proposals to be optimised through a design-led approach.
SP9/23	SP9	Support principle of policy but design is subjective and have not been impressed with schemes granted to date	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP9/24	SP9	Concerns with reference to high densities and tall buildings. Heights should be under 20 storeys and densities below 350 units per hectare.	13	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. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. OPDC's Tall Building Statement provides information supporting this approach. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. OPDC's Development Capacity Study sets out the methodology undertaken to define the development capacity of the OPDC area based on Local Plan supporting studies and development scheme precedents that meets London Plan homes and jobs targets.
SP9/25	SP9	Support approach to heritage assets and designation of the Cumberland Park Factory Conservation Area	13	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,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP9/26	SP9	OPDC should compile a list of unregistered heritage assets for the whole area.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC has consulted on its proposed local heritage listings.
SP9/27	SP9	OPDC's Place Review Group should have representation from community members	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	OPDC's Place Review Group comprises a panel of built environment experts to provide independent advice for development proposals. A community forum has been established to inform the development management process.
SP9/28	SP9	Planning applications are unduly influencing policy development. This and policies DI1 and DI2 are unjustified.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The Local Plan has been developed based on a significant number of supporting studies to provide an evidence based approach to ensure development of Old Oak and Park Royal is plan-led. OPDC considers

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	policies DI1 and DI2 are sound based on robust and deliverable evidence base.
SP9/29	SP9	<p>Insufficient justification for tall buildings and demonstration that this will deliver lifetime neighbourhoods has been provided. The Plan does not provide enough clarity on future building heights, locations of tall buildings or definitions of tall buildings. A map of tall building locations should be provided. Indicative building heights of 40 storeys + are not justified. Density information in DCS is not reflected in the Local Plan</p> <p>This does not conform with London Plan policy 7.7 or NPPF para 58 and 59.</p>	28	<p>Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Wells House Road Residents Association, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Hammersmith Society, ArtWest, St Quintin and Woodlands Neighbourhood Forum, Nicky Guymmer, Bruce Stevenson, Tom Ryland, Oonagh Heron, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Grand Union Alliance, Midland Terrace Residents, Nye Jones</p>	<p>Change proposed. Further wording has been inserted into the supporting text of SP9 to clarify the average densities expected in the OPDC area based on DCS outputs to achieve homes and jobs targets.</p> <p>Change proposed. Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas.</p> <p>Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8(B) as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings,</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory.</p> <p>No change proposed. OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF paragraphs 58 and 59.</p>
SP9/30	SP9	Only MOL and SINCS are included in map 3.14. Other spaces should be included.	13	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. The map supporting policy SP8 has been amended to include all publicly accessible open space.
SP9/31	SP9	Carry out a detailed analysis of actual land available for housing supply once all the other requirements for land have been taken into account, e.g.: employment, transport (particularly roads), social infrastructure and green spaces.	13	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,	No change proposed. OPDC's Development Capacity Study has taken into account the need to provide non-residential floorspace and the need for public realm and streets. The capacity figures are based on the net developable area.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP9/32	SP9	Support proposals for new bridges and underpasses, which must be designed to a high standard and need to be perceived as safe to use	1	Brent Cyclists	No change proposed. OPDC will promote the use of high quality materials to ensure bridges and underpasses are well designed and therefore well used

Strategic Policy SP10: Integrated Delivery

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP10/1	SP10	Service providers should be party to all funding and delivery mechanisms.	1	Hammersmith and Fulham Council	Noted.
SP10/2	SP10, Figure 3.16	Figure should be amended to remove Lakeside Drive as a 0-5 year development site, but include the open space on Twyford Abbey Road	1	Diageo Plc	No change proposed. Officers do not propose to designate open space at Twyford Abbey Road as a development site and land at Lakeside Drive as an open space. Figure 3.16 therefore does not require amending on this basis.
SP10/3	SP10	Support the principle of bringing forward development in advance of the phasing identified in Figure 3.16	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted.
SP10/4	SP10	Welcome the positively planned approach to physical and social infrastructure	1	Mayor of London	Noted

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP10/5	SP10	Welcome recognition in SP10 that developers should contribute 'appropriately and proportionately to infrastructure.	1	Old Oak Park Ltd	Noted.
SP10/6	SP10, Para 3.109	It should also be recognised that the equalisation mechanism would be applied between early sites that come forward ahead of new infrastructure yet rely on it, and later developments which provide the infrastructure.	1	Old Oak Park Ltd	Change proposed. Further wording has been inserted to clarify the workings of the equitable equalisation mechanism, including that it would apply to early sites coming forward in advance on on-site infrastructure, the sites delivering the infrastructure and later sites contributing towards that infrastructure through a retrospective pooling contribution.
SP10/7	SP10	Support Policy SP10	18	Healthy Urban Development Unit, Environment Agency, Hammersmith and Fulham Council, Friary Park Preservation Group, Hammersmith Society, Education and Skills Funding Agency, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP10/8	SP10, Para 3.105	Support para 3.105 and will seek to support OPDC to ensure development contributions are sought for specific and wider infrastructure needs.	1	Hammersmith and Fulham Council	Noted.
SP10/9	SP10	Support requirement for an Infrastructure Delivery Strategy, but reference should be made to service providers being involved in discussions in para 3.109	1	Hammersmith and Fulham Council	Change proposed. Text has been added to the paragraph to require developers to hold early discussions with infrastructure service providers.
SP10/10	SP10, 3.111	Supports joint working to manage impacts on amenity and on the highway network	1	Hammersmith and Fulham Council	Noted.
SP10/11	SP10	The policy is not effective as delivering development as early as possible will not realise wider benefits and support sustainable development.	13	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 policy is considered effective. Delivering development early will help meet the need for homes, jobs and services in the area and also help to meet more strategic needs. Policies across the plan require that impacts of development are appropriately mitigated. This includes securing the necessary infrastructure to support development (SP10 and DI2), mitigating impacts during construction (SP10 and T8) and applying the agent of change principle when considering issues such as noise and vibration (EU5).

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP10/12	SP10	When considering infrastructure, need to factor that there will be demands arising from other growth outside of the OPDC area	1	West London Line Group	Noted. In accordance with the Duty to Cooperate, OPDC has been in discussions with other local authorities and public bodies to understand whether needs outside of OPDC's area are also required to met through planning policy and where necessary and appropriate, these requirements have been addressed in the Local Plan.
SP10/13	SP10, Figure 3.16	Twyford Tip site should be identified as being deliverable within 0-5 years in the phasing diagram	1	Ashia Centur Limited	No change proposed. OPDC has undertaken a study looking at the viability of delivery of development options on the Twyford Tip site. This has shown that the site is not likely to be viable to be delivered for development, given its significant contamination. OPDC therefore does not consider the site to be deliverable within the next 5 years.

4. Places

Introduction

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P/1	Introduction	Place policies P7 and P8 should cross reference to Policy D11	1	Segro	No change proposed. The introduction to the places identifies that all place policies have policy links to all delivery and implementation policies.

All Place Policies

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P/2	ALL	Place policies should be identified as non-strategic policies.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as

					how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P/3	ALL	Air quality guidance should be included in place policies. Air quality needs to be monitored.	15	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; John Cox; Catherine Sookha;	No change proposed. Place specific air quality guidance is provided where OPDC's Air Quality Strategy has identified specific locations for interventions. Guidance for air quality for the whole OPDC area is provided in Policy EU4. Air quality monitoring is carried out by Brent, Ealing and Hammersmith and Fulham Council's as part of the designated Air Quality Management Areas that cover the entirety of the OPDC area.
P/4	ALL	The 'Places' chapter should provide a clearly defined spatial vision, together with proposals which seek to actively promote and facilitate the delivery of industrial intensification.		CBRE (on behalf of SEGRO);	No change proposed. The vision and policies already support intensification across Park Royal.
P/5	ALL	Support references to benefits of circular economy in the Places chapter regarding the exchange of goods and services and resource use.	1	LWARB	Noted.
P/5	ALL	The Place specific policies should make specific mention	1	Sport England	No Change proposed. Place policies only deal with matters specific to each place. The design

		to Active Design so that principles are engrained in new development.			chapter deals with supporting active lifestyles, as does policy SP3.
P/6	ALL	Targets for place policies are unjustified	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the homes and jobs targets for each place are justified. These are based on development capacity information set out in OPDC's Development Capacity Study. This has been developed in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. The Development Capacity Study is based on development capacity information set out in the Old Oak North Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document provided specific information for development capacity for the Development Capacity Study.
P/7	ALL	The policies are too detailed and should instead be replaced by area action plans and neighbourhood plans	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does

					consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P/8	ALL	Place policies P4, P5 and P7 are too vague about protecting existing open space.	1	Sport England	No change proposed. The requirements for protecting open space are set out in Policies SP8 and EU1. Place policies only deal with place specific policy issues.
P/9	ALL	The large HGV-friendly street signs on the Slough trading estate should be learnt from.	1	Park Royal Business Group	No change proposed. The need for improved wayfinding is already covered by P4, P5 and P6.
P/10	ALL	There are issues with planning enforcement, transport links, infrastructure and road safety in Park Royal	1	Praveen Anand	No change proposed. OPDC has full planning enforcement powers and will act on individual cases where information relating to a breach of planning control has been provided. The Park Royal Place and Transport Policies all recognise the need for transport and infrastructure improvements including supporting improved bus services and walking/cycling routes. Policy P7 covering North Acton supports the delivery of a mix of town centre uses to help support the needs of local communities.
P/11	ALL	Support provision of green infrastructure across Park Royal, including food growing	15	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted.

				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Old Oak Neighbourhood Interim Forum; Regents Network; Turley (on behalf of Ashia Centur Limited)	
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Place Policy P1: Old Oak South

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/1	P1	The Local Plan should support the delivery of a conference/exhibition/performance facility close to Old Oak Common station	1	West London Line Group	No change proposed. The Local Plan supports the creation of a major town centre along Old Oak High Street and within Policy SP6, supports the potential for catalyst uses, which could include a conference/exhibition/performance facility. However, OPDC does not propose to allocate land for such a use and considers it appropriate to maintain flexibility over what catalyst uses may be appropriate in the area and judge any proposals against relevant planning policy and specifically Policy TCC8 (Catalyst Uses).
P1/2	P1	Old Oak South cannot deliver high density development with tall buildings with the current HS2 Ltd plans to naturally ventilate the station. The Local Plan cannot therefore be considered justified or effective	1	HS2 Ltd.	Change proposed. A decision has now been taken by DfT and HM Treasury to mechanically ventilate the station. Notwithstanding this, OPDC has undertaken more detailed development capacity modelling that has resulted in a reduced quantum being identified for the HS2 station triangle site and this change in capacity has been

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					reflected in the Old Oak Common station and surrounds allocation.
P1/3	P1	Acknowledge that Oaklands South development delivering Park Road can help open up Old Oak North	1	Genesis	Change proposed. Supporting text to Policy P1 has been amended recognising the role of Park Road in providing access to Old Oak North.
P1/4	P1	Development capacity proposed on the HS2 station and surrounds is not justified. This level of development would not be supported by enabling works currently proposed by HS2. Suggest that policies are drafted more flexibly to allow for a range of development scenarios.	1	HS2 Ltd.	Change proposed. The capacity for the HS2 triangle site has been revised following further development capacity work to align with the proposed HS2 enabling works.
P1/5	P1	Figure 4.3 does not show Wormwood Scrubs Street, despite clear references to the delivery of this street in the policy and supporting text.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC has labelled Wormwood Scrubs Street on figure 4.3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/6	P1	Disagree with the need for more than the green bridge connection between Old Oak and Wormwood Scrubs, and don't see the need for a cycling route to the Scrubs from Old Oak. Further feasibility work is required to support the entrance to Wormwood Scrubs from the bridge.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Wormwood Scrubs Act (1879) states that Wormwood Scrubs should be held "upon trust for the perpetual use thereof of the inhabitants of the metropolis for exercise and recreation". Providing access to the Scrubs for the new residents, employees and visitors within Old Oak accords with the Act; however, any access would need to be sensitively designed to minimise its impact on the ecological value of the Scrubs and would need full agreement from the Wormwood Scrubs Charitable Trust.
P1/7	P1	Unclear on how development will "celebrate" the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Celebrating Wormwood Scrubs is envisaged to be delivered by the policies within the Local Plan including its conservation and enhancement.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/8	P1	Place policies for P1, P2 and P11 are too vague with regards to financial contributions for Harlesden Town Centre from new commercial development in the Old Oak commercial centre. Policies should clearly require that contributions will have to be secured.	2	London Borough of Brent, Harlesden Neighbourhood Forum	Change proposed. Policy P1(g) and supporting text have been relocated to policy TCC1.
P1/9	P1	The Elizabeth Line depot is not likely to be brought forward for the delivery of homes and jobs within the plan period. Reference to it being delivered within the plan period should be removed from the Local Plan.	3	Mayor of London, Transport for London (Group Planning), Transport for London (Commercial Development)	Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
P1/10	P1	Amend wording to reference development of business case for potential bridge connections to the north in addition to Old Oak High Street.	1	Transport for London (Group Planning)	Change proposed. Wording has been added to policy P1 supporting text to reflect outputs of the Old Oak North Development Framework Principles in defining connections between Old Oak South and Old Oak North.
P1/11	P1	Oaklands supports delivery of Place vision, and commencement should be acknowledged.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. Following completion of the Oaklands development it will be depicted as an existing residential neighbourhood.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/12	P1	It is appropriate that land in Old Oak South be developed to a high density. Tall buildings will be appropriate.	1	Mayor of London	Noted. This is supported through policies in the Local Plan.
P1/13	P1	Consider 'sensitively respond' to be more appropriate than 'appropriately responding'	1	London Borough of Hammersmith and Fulham	No change proposed. Existing residential areas and Wormwood Scrubs are identified in Policy SP9 to be sensitive locations. 'Appropriately responds' is consistent with the approach taken in SP9 with regards to building heights and is considered to provide sufficient policy guidance to ensure building heights respond to sensitive locations.
P1/14	P1	Policy is sound	1	Friary Park Preservation Group	Noted.
P1/15	P1	Plans should reflect the green space proposed by HS2 Ltd. between Wells House Road and Old Oak Common Station.	12	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Wells House Road Residents Association, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that this is an important development site to optimise development capacity around the station. Development on this site is supported by HS2 Ltd, subject to it not conflicting with the effective operation of the station.
P1/16	P1	Definition for a "community hub" should be included for clarity.	1	Diocese of London	Noted. Reference to community hubs have been replaced to references to OPDC's Infrastructure Delivery Plan. This provides information for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					requirements for community facilities. These are defined in the glossary.
P1/17	P1	Policy is unsound	1	Sarah Abraham	No change proposed. OPDC considers Policy P1 to be sound.
P1/18	P1	Policy should state that residential enclaves are not overshadowed by development that is out of scale with them or more than six storeys in height.	19	Nicky Guymer, Bruce Stephenson, Mark Walker, Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the need to deliver appropriate standards of amenity for existing residential areas as being an important component in the design and delivery of development proposals. These proposals will need to be considered on a case by case basis. As such Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
P1/19	P1	The Crossrail depots cannot be redeveloped and the HS2 station site cannot accommodate significant capacity without being decked which HS2 do not support.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara,	Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Without these two issues being addressed, the Plan is unsound.		Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
P1/20	P1	Concerns about design of planned Old Oak Common Station and provision of bus routes to the station	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will work closely with HS2 to deliver a state of the art, exceptionally designed 21st century multi-modal transport interchange. Policy P1C1 provides guidance to inform the design of the station.
P1/21	P1	A design competition for the Old Oak Common Station should be carried out	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted. OPDC will work closely with HS2 to deliver a high quality design process.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P1/22	P1	Alternative sites for a primary school should be considered.	1	Transport for London (Commercial Development)	No change proposed. Policy TCC4 provides a mechanism for identifying alternative primary school locations. The need for an approach which responds to change in development and population requirements is set out in the supporting text. As identified in Policy SP10, an equitable equalisation mechanism and retrospective pooling contribution mechanism will be used to fund the delivery of facilities.
P1/23	P1	Costs of delivering decking above the depot should be considered. Statement of Common Ground sought.	1	Transport for London (Commercial Development)	Change proposed. OPDC has removed the delivery of development on the Elizabeth Line depot from the Plan period. As such the consideration of the costs of decking is beyond the role of the Local Plan. OPDC will continue to work with TfL to explore deliverability of the site.
P1/24	P1	Development of sites before the Elizabeth Line Depot should not preclude its development.	1	Transport for London (Commercial Development)	No change proposed. Policy SP10 provides policy to ensure all development complements and does not unduly restrict development on adjacent and connected sites.
P1/25	P1	Design of Old Oak Common Station should not focus on delivering an iconic or feature	1	Transport for London (Commercial Development)	No change proposed. OPDC considers that P1C1 Vision and Policy P1C1 provide appropriate guidance to ensure the station is integrated with surrounding areas.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		standalone station to support development around the station.			
P1/26	P1	Question if a specific number of jobs is required and whether these will be deliverable given uncertainty around the Crossrail depots, decking around the station and changes in the office market.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. To ensure OPDC can demonstrate the Local Plan is in general conformity with the London Plan employment target. The economic floorspace from which job figures are derived is required to be defined in accordance with NPPF paragraph 161 and NPPG guidance on Housing and Economic Land Availability Assessments. Any amendments to development capacity will be reflected in revisions to be Local Plan and related supporting evidence studies.
P1/27	P1	Support meanwhile uses in Old Oak South	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	
P1/28	P1	Policy should specify building heights in around Old Oak Common Station	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Old Oak Common Station and surrounding areas are identified as longer term development sites. As such, the provision of policies defining specific building heights at this point in time is not considered to be appropriate. Policy SP9 identifies this area as appropriate for tall buildings in principle but also continues to require proposals to accord with all relevant policies in national guidance, the London Plan and the Local Plan.
P1/29	P1	The rail interchange will be a focus for development but the station cannot form a heart for the development.	1	Regents Network	No change proposed. OPDC considers that Old Oak Common Station has the potential to be a destination at the heart of a new major town centre and commercial centre reflecting the development potential and high levels of public transport accessibility.
P1/30	P1	Figure 4.4: Kings Cross is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Kings Cross to be an appropriate precedent.
P1/31	P1	Figure 4.5: More London is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers More London to be an appropriate precedent.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/32	P1	Figure 4.6: Bankside is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Bankside to be an appropriate precedent.
P1/33	P1	Figure 4.7: St. Andrews, Bow is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers St. Andrews, Bow to be an appropriate precedent.
P1/34	P1	Figure 4.9: Rotterdam Central Station is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Rotterdam Central Station to be an appropriate precedent.
P1/35	P1	Figure 4.10: St. Pancras Station is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers St. Pancras Station to be an appropriate precedent.
P1/36	P1	Figure 4.11: Lierge-Guillemins Station is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Lierge-Guillemins Station to be an appropriate precedent.
P1/37	P1	Consultation with Friends of the Wormwood Scrubs and agreement of the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council are essential for any proposals for the Scrubs.	14	TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The supporting text sets out OPDC's commitment to agreeing any proposals with the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council and consulting with the Friends of Wormwood Scrubs.
P1/38	P1	The vision for a commercial centre on the Crossrail Depot site is not deliverable, and the site will be a	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC is seeking to deliver a range of projects to improve the environment and activate areas along the Grand Union Canal,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		blight on the canal and wider area for many years. Options for full or partial relocation should be outlined.			including north of the Elizabeth Line Depot. This is supported by Policy TCC9 in the Local Plan. Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. As such, the development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
P1/39	P1	The ideas about access from the built up areas into the Wormwood Scrubs are not clearly described in the Local Plan.	1	Wormwood Scrubs Charitable Trust	No change proposed. The figure sets out the indicative location of new and improved access points to Wormwood Scrubs. This level of detail is appropriate for the role of the Local Plan.
P1/40	P1	The Trust welcomes the statement that the OPDC will agree any proposals with the Wormwood Scrubs Charitable Trust.	1	Wormwood Scrubs Charitable Trust	Noted.
P1/41	P1	Entrance to Old Oak Common Station should be from the east to Scrubs Lane.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier,	No change proposed. OPDC is working closely with HS2 Ltd and DfT to ensure the HS2 station provides appropriate access.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P1/42	P1	Access from Old Oak Common Station to Wormwood Scrubs should not be provided.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The plan indicates a longer term access south from Old Oak station to Wormwood Scrubs to cater for demand from the south to access the station and the new amenities being delivered in Old Oak.
P1/43	P1	Gradient and design of Old Oak High Street. Retention of Elizabeth Line Depot will require a long bridge over the depot.	13	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,	No change proposed. Connections to Old Oak North, via Old Oak Street can be achieved to the east of the depot where bridging requirements are much shorter.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

P1C1: Old Oak Common Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1C1/1	P1C1	An additional level should be created above ground in the Old Oak Common station to connect in local rail services	1	West London Line Group	No change proposed. This option was explored as part of Grip 2 work for the London Overground stations. Due to high cost and impact on services, this option is not supported by TfL, DfT or HS2 and OPDC does not propose to safeguard land for this option in the Local Plan.
P1C1/2	P1C1	The Local Plan should specify the amount of structural foundations required within the Old Oak Common station	1	West London Line Group	No change proposed. Structural foundations are not a planning matter, being governed by Building Regulations and in any case, for Old Oak Common Station are a matter for the London - West Midlands Act 2017.
P1C1/3	P1C1	Old Oak Common station policy should support enhanced access to and from the OPDC area and facilitate the widest possible range of journey options	1	West London Line Group	No change proposed. The need for the Old Oak Common station to deliver excellent local, regional and national connections is referenced in the Vision for Old Oak South. The importance of the connectivity brought by the station is also referenced in the Spatial Vision and Policy SP1.

P1C1/4	P1C1	Para OOC.7 should clarify that the 250,000 passengers figure is per day. Question this assumption as it may not include population assumptions from Old Oak and Park Royal and evidence shows that historic estimates of interchange numbers underestimate.	1	West London Line Group	Change proposed. Wording has been inserted to clarify that the 250,000 passenger figure is per day.
P1C1/5	P1C1	Time period for station demand figures needs to be clarified.	1	Transport for London (Group Planning)	Change proposed. It is appropriate to provide clarity regarding the year modelling had been carried out and the supporting text has been amended.
P1C1/6	P1C1	Policy diagrams for Old Oak South Place are unsound. Policy diagrams should reflect both end-state aspirations and HS2's currently committed Act scheme.	1	HS2 Ltd.	Change proposed. OPDC has amended the figure to show a diagram depicting HS2's currently committed scheme within the High Speed Rail (London - West Midlands) Act 2017 scheme for 2026 to demonstrate how the area will change.
P1C1/7	P1C1	Public open spaces and station squares should promote natural green landscaping, trees etc. rather than swathes of hard surfacing. Tree lined routes can help promote legibility. Maintenance and management plans, materials for public realm	1	London Borough of Hammersmith and Fulham	Noted. The supporting text identifies that the Old Oak South Local Park will comprise a number of connected spaces ranging from hard landscaped station stations with civic functions to green pocket parks. Noted. Policy EU2 provides guidance for urban greening. Change proposed. Maintenance and management plans for open spaces and materials should be consulted with the relevant borough where appropriate. This requirement has been added to relevant policies.

		improvements must be agreed with the Boroughs.			
P1C1/8	P1C1	Old Oak Common Station needs to carefully design to provide ample cycle parking.	1	London Borough of Hammersmith and Fulham	Noted. OPDC will work closely with HS2 to ensure sufficient provision of cycle parking.
P1C1/9	P1C1	Development needs to take into account quality and appearance.	1	London Borough of Hammersmith and Fulham	Noted. Policies SP9, D2, D4, D5, London Plan policies and national guidance will be used to delivery high quality design of development.
P1C1/10	P1C1	The HS2 Station design (internal) and surrounds (external area) must address and support the growth in population; the regeneration ambitions of the Local Plan which will connect the station to surrounding stations.	1	London Borough of Hammersmith and Fulham	Noted. OPDC will work closely with HS2, DfT and TfL to ensure Old Oak Common Station supports the increase in population and is well connected to other stations. Policies SP7, P1, P1C1 and P2 provide this guidance in the Local Plan.
P1C1/11	P1C1	There are doubts that Old Oak Common Station will be built.	1	Friary Park Preservation Group	Noted. The enactment of the High Speed Rail (London - West Midlands) Act 2017 confirms that HS2 will be delivered. Site works are now underway.
P1C1/12	P1C1	Policy is sound	1	Diocese of London	Noted.
P1C1/13	P1C1	Policies requiring transport infrastructure, namely the HS2 station, to support planned growth in the OPDC area are unsound. The policies would require works to cater for additional station capacity outside of HS2's scope as set out in the Act. For the policies to be sound they should accurately reflect HS2's set scope for station capacity and be more flexible	1	HS2 Ltd.	No change proposed. The policy is considered to provide sufficient reference to the HS2 Act and flexibility to accommodate future capacity.

		on aspirations for future capacity.			
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Place Policy P2: Old Oak North

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2/1	P2	Should make use of West London Line viaduct space for town centre uses	1	West London Line Group	Noted. Old Oak North Development Framework Principles recommends the delivery of a viaduct and delivery of town centre uses around the potential Hythe Road Station. This is reflected in the policy.
P2/2	P2	Construction of an initial phase of Old Oak High Street truncated by the canal and Crossrail depot will not encourage early activation in Old Oak North.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Old Oak North Development Framework Principles demonstrates that connections from Scrubs Lane, Old Oak Common Lane via key routes will support early activation of Old Oak North.
P2/3	P2	Town centre uses at Grand Union Square and other major canal crossings should be restricted to facilitate the new Local Park.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers that retail, leisure and community uses have the potential to complement and support activation of the proposed Grand Union Canal Local Park.
P2/4	P2	Policy should reference benefits of early delivery of new bridge link to Willesden Junction Station.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted. OPDC considers Policy P2 provides sufficient guidance for the delivery of new connections to Willesden Junction that reflects current phasing of development.
P2/5	P2	Careful consideration should be given to the environment created by the Old Oak Sidings Waste Site and impacts on residential	15	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis, Victoria Hollertz, TITRA, Wells House Road	No change proposed. The requirement for new or enhanced waste sites to minimise environmental impacts is covered in Policy EU6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development. Policy should go further in supporting health and well being to mitigate the impact on existing waste management sites on residential areas.		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	
P2/6	P2	Policy should acknowledge that EMR site could come forward earlier than currently envisaged.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy DI2 provides guidance that ensures all development proposals are brought forward as early as possible.
P2/7	P2	Policy should state that tall buildings may be appropriate near to the bridge leading to Willesden Junction Station.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. OPDC considers that Policy P2 provides sufficient guidance for the location of tall buildings in Old Oak North based on evidence base.
P2/8	P2	Smaller residential units do not need to be focussed around the small business hub.	1	Old Oak Park Limited	Change proposed. Policies relating to the location of smaller units have been removed from policy P2.
P2/9	P2	Reprovision of creative businesses (in terms of quantum, type or reprovision of businesses) is not appropriate. Rolls Royce Building should not be identified to have the opportunity to deliver space for meanwhile uses.	1	Old Oak Park Limited	No change proposed. Policy E2 provides guidance for the reprovision of existing businesses outside of SIL. The Rolls Royce Building is proposed to be Locally Listed and the envisaged retention in the short/medium would place this as an appropriate location for meanwhile uses.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2/10	P2	Level of detail on meanwhile uses is inappropriate. Suggested that this is removed	1	Old Oak Park Limited	Change proposed. Detailed guidance for meanwhile uses has been removed to avoid repetition with Policy TCC9.
P2/11	P2	Northern viaduct solution for Hythe Road Station will make the sustainable drainage solution difficult to achieve	1	Old Oak Park Limited	No change proposed. OPDC considers Policy EU3 provides an appropriate framework to inform site specific interventions to deliver sustainable drainage infrastructure appropriate to the role of a Local Plan.
P2/12	P2	Greater clarity required about locally listed buildings in OON	1	Old Oak Park Limited	Noted. OPDC has consulted separately on its proposed local heritage listings.
P2/13	P2	Greater clarity required on whether development in OON should deliver or facilitate the walking/cycling bridge to Wormwood Scrubs	1	Old Oak Park Limited	No change proposed. Policy P2 provides information regarding retrospective pooling contributions
P2/14	P2	The level of detail provided in the policy is beyond what should be included in a Local Plan and would be more appropriately addressed through a masterplan planning application	1	Old Oak Park Limited	No change proposed. OPDC considers the level of detail provided is appropriate.
P2/15	P2	Support for delivery of 5000 new jobs and 2400 new homes in first 10 years	1	Fruition Properties	Noted.
P2/16	P2	The large waste sites need to be encouraged to move on at the earliest opportunity.	1	Victoria Hollertz	No change proposed. Old Oak Sidings waste site is required to meet Hammersmith and Fulham's waste appointment targets for the London Plan period. The site also has the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					potential to support the management of waste during the construction of Old Oak and contribute to a district heating/energy network. As such, the Old Oak Sidings waste site is safeguarded for the Local Plan period.
P2/17	P2	Support OON11 and OON12 and activation of Old Oak High Street.	1	Victoria Hollertz	Noted.
P2/18	P2	Support OON18 and target for new green space.	1	Victoria Hollertz	Noted.
P2/19	P2	Support OON24 and protecting heritage.	1	Victoria Hollertz	Noted.
P2/20	P2	There is concern that the policy commitment to the inclusion of energy from waste is premature given that no assessments of the requirements of such a proposal or the potential impacts has been carried out or included as part of the Local Plan consultation.	1	London Borough of Hammersmith and Fulham	No change proposed. The policy does not commit to delivering energy from waste. Any use would need to comply with OPDC's air quality policy and other material planning considerations. OPDC has undertaken a study looking at the air quality impacts from Energy from Waste at Old Oak Sidings and this supports the Local Plan.
P2/21	P2	There is no mention of OPDC's plans to relocate the EMR waste management site in Policy P2 and EU6. The safeguarded status of the Old Oak Sidings (Powerday) site should also be included.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy P2 safeguards Old Oak Sidings for waste management and apportionment purposes. The loss of EMR as a waste site would be managed through the policy requirements set out in EU6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2/22	P2	OON.8, OON.12, OON.19 Areas inappropriate for housing would also be appropriate for artist space; artists' workspaces during the development stages could be very beneficial to the OPDC; Arts Centre Space offering workshops etc. could be included to feed into the community leisure, activity and social needs.	1	ArtWest	Noted. Employment floorspace referenced includes artist space. Policy TCC9 sets out guidance to support meanwhile uses.
P2/23	P2	Development should be encouraged to retain parts of the Rolls Royce Building and / or canalside warehouses for reuse by creative uses.	14	Hammersmith and Fulham Historic Buildings Group, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy D8 and P2 provide guidance for conserving and enhancing existing locally listed buildings including Rolls Royce Building and adjacent canalside engineering works. NPPF paragraph 126 provides guidance for the viable reuse of heritage assets.
P2/24	P2	Supportive of Cargiant reducing densities and proposing to retain the Rolls Royce building.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P2/25	P2	Without a commitment to the delivery of Hythe Road Station, the densities in Old Oak North are unjustified resulting in the policy being ineffective.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. This includes improvements to existing stations and proposed new stations such as Old Oak Common Station and Hythe Road Station. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support density of development.
P2/26	P2	Support proposed Hythe Road Overground station, subject to it allowing for retention of artists' studios	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P2/27	P2	The housing targets of Old Oak North (Policy P2) appear more realistic and acceptable having been reduced by a third by the landowners from their original proposals. Welcome OPDC amending homes target to reflect Cargiant's figures but this has resulted in an increased target for Scrubs Lane.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Residential development capacity along Scrubs Lane has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance based on the Scrubs Lane Development Framework Principles capacity assessment.
P2/28	P2	Support the delivery of the viaduct option within Old Oak North.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P2/29	P2	Strongly support re-provision of creative business space	15	Old Oak Interim Neighbourhood Forum,	No change proposed. The employment policies support the re-provision of existing employment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		but E1 will not ensure that this is re-provided at realistic rent levels for artists.		TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	floorspace, including creative business space. Supporting text to E2 sets out the approach to ensure reprovided floorspace is affordable. This would also include creative business space.
P2/30	P2	Figure 4.13: Elephant Park is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Elephant Park to be an appropriate precedent.
P2/31	P2	Figure 4.14: City Island is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers City Island to be an appropriate precedent.
P2/32	P2	Figure 4.15: Barking Town Centre is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Barking Town Centre to be an appropriate precedent.
P2/33	P2	Figure 4.16: Handyside Park, Kings Cross is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Handyside Park to be an appropriate precedent.
P2/34	P2	Figure 4.19: Granary Square, Kings Cross is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Granary Square, Kings Cross to be an appropriate precedent.
P2/35	P2	Figure 4.20: The Grand Canal Square, Dublin is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers the Grand Canal Square to be an appropriate precedent.
P2/36	P2	It is appropriate that land in Old Oak North be developed	1	Mayor of London	Noted. This is supported through policies in the Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		to a high density. Tall buildings will be appropriate.			
P2/37	P2	Policy is overly prescriptive in identifying where there should be greater concentrations of family and smaller units. It should be dealt with through the masterplanning application	1	Old Oak Park Limited	Change proposed. Policies relating to the location of family sized units and smaller units have been removed from policy P2.
P2/38	P2	Support Policy P21 in broad terms	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

P2C1: Grand Union Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2C1/1	P2C1	More detail required on types of facilities proposed for canal boaters.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers Policy P3 provides sufficient guidance to deliver new canal facilities.
P2C1/2	P2C1	Observe omission of Figure 36 from previous Draft Local Plan in revised draft.	1	The Inland Waterways Association-Middlesex Branch	Noted. Computer Generated Images are not included within the Revised Draft Local Plan.
P2C1/3	P2C1	Final station design proposals for proposed Hythe Road Overground station are still to be developed, and the station should be referred to as "potential".	1	Transport for London (Group Planning)	Change proposed. References to the Hythe Road Overground Station have been amended to refer to it as a potential station where appropriate.
P2C1/4	P2C1	P2C1 is too detailed and better suited for a planning brief informed by the Old Oak Masterplan and Old Oak Park Masterplan planning application.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. P2C1 has been removed to avoid duplication with policy P2.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/1	P3	Broadly support the proposed approach to the Grand Union Canal	1	Canal and River Trust	Noted.
P3/2	P3	Canal River Trust are incorrectly recognised as landowner of the Grand Union Canal, whereas they are in fact just a management organisation. Unless this is recognised, it has impact on the soundness of the Local Plan consultation.	1	Regents Network	No change proposed. OPDC has confirmed with the Canal and River Trust that for the purposes of the Local Plan, references to the organisation as a landowner is appropriate.
P3/3	P3	Historic attempts were made to deliver a northern towpath along the Grand Union Canal, and the land to allow for this may still be in public ownership.	2	Regents Network	Noted. This information will be used to inform future detailed proposals.
P3/4	P3	Concerns of the proposal for the southern towpath to deliver a 2-way cycle lane. Width of tow path should be increased.	24	Regents Network, Canal & River Trust, ArtWest, Nicky Guymer, Bruce Stephenson, Hammersmith Society, Oonagh Heron, Mark Walker, West Twyford Residents Association, Old Oak Interim Neighbourhood Forum, Dave Turner, Regents Network, TITRA, Midland Terrace	Change proposed. Policy P3 has been amended to reflect the character and transport roles of the towpath while recognising width restrictions to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P3/5	P3	Intention to focus A3 and A4 uses onto the canalside adjacent the canal is supported, though negative impacts should be considered through detailed design.	1	Regents Network	Noted. Policy P3 provides guidance to ensure land uses support the activation of the canal and canalside spaces.
P3/6	P3	Concern that uniform building heights of 6-8 storeys along the canal will have a negative impact on amenity, and that amenity standards are not high enough.	2	Canal & River Trust, The Inland Waterways Association-Middlesex Branch	Change proposed. To recognise the need for building heights to respond to site specific circumstances, supporting text to P3 has been amended to highlight the need to provide appropriate enclosure along the canal. It should be noted that any proposal will need to accord with all other relevant planning policy and material considerations to provide appropriate levels of amenity and a high quality built environment.
P3/7	P3	Crossing points may not be best locations for taller	15	Canal & River Trust, Old Oak Interim	No change proposed. To respond to public transport access and support legibility where

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		buildings along the Canal. Tall buildings will obstruct views and vistas along the canal and use for wayfinding is questionable.		Neighbourhood Forum, The Inland Waterways Association-Middlesex Branch, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	major routes cross the canal, tall buildings are considered to be appropriate. Proposals for tall buildings at these locations will be considered on a case by case basis and will be determined using all other relevant planning policy and material considerations.
P3/8	P3	Policy should make clear that assessment of building heights will consider impact on heritage, character, biodiversity and amenity will be made at application stage. Retention of Birchwood Nature Reserve is supported.	4	Canal & River Trust, Sarah Abraham, ArtWest, Regents Network	No change proposed. Assessment of buildings heights will be carried out in accordance with national guidance, London Plan policies and Local Plan policies (specifically policies SP8, SP9, D8, D5 and D6).
P3/9	P3	The CRT have no in principle planning objections to the proposed canal crossings. New crossings require the CRT's agreement, but role of secretary of state and highway authority should also be highlighted.	1	Canal & River Trust	Change proposed. OPDC considers highlighting the need for Canal and River Trust's and other stakeholder's agreement for crossings should be referenced within the supporting text to policy P3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/10	P3	New bridges will need to be of high quality to ensure high quality public realm. Stronger wording should be provided	1	Canal & River Trust	No change proposed. Requirements for high quality design of buildings and the public realm are made in Policies D2 and D4.
P3/11	P3	The CRT are not convinced of the need for a bridge crossing within the Channel Gate area, but have no objection to its inclusion in the plan.	1	Canal & River Trust	Noted. Further detailed feasibility studies for a bridge in this location will be undertaken following the release of sites for development.
P3/12	P3	Opportunity may exist to re-use the Brunel Bridge from Paddington within the Old Oak development area.	1	Canal & River Trust	Noted.
P3/13	P3	Support for new permanent and temporary moorings. CRT suggest strengthening policy wording to provide stronger support. Detailed issues such as servicing and infrastructure when the CRT assess individual applications.	15	Canal & River Trust, Hammersmith Society, Regents Network, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the policy gives appropriate support to moorings.
P3/14	P3	Text should be added to Policy P3 to to protect the waterway from adverse impacts from new	1	Canal & River Trust	Change proposed. OPDC has amended the Local Plan to highlight the need to manage impacts of structural integrity on the canal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development, including structural integrity and land stability.			
P3/15	P3	CRT support the intention of a linear park along the Canal and feel consideration should be given at detailed design stage to how this will connect with other green spaces. Also welcome requirements for appropriate light levels given adverse impact on foraging bats.	14	Canal & River Trust, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P3/16	P3	Where appropriate, development contributions should be sought for improvements of the environmental quality of the canal.	1	Canal & River Trust	Change proposed. The supporting text has been amended to seek contributions.
P3/17	P3	Welcome support for waterborne freight transport but feel the Plan could be stronger in requiring developers to consider its use.	2	Canal & River Trust, Regents Network	No change proposed. Policy T7 requires development to maximise the use of more efficient and sustainable ways of delivering freight including by water.
P3/18	P3	Welcome designation of Grand Union Canal as a separate Place.	1	The Inland Waterways Association-Middlesex Branch	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/19	P3	Welcome vision for canal towpath.	1	The Inland Waterways Association-Middlesex Branch	Noted.
P3/20	P3	No locations for new water spaces have been identified. Unless such spaces are safeguarded it is unlikely they will be realised.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 provides guidance for the delivery of new basins and waterspaces. Specific locations have not been identified to enable a flexible approach to their delivery.
P3/21	P3	Precedent of Chicago Riverwalk is inappropriate for the Grand Union Canal.	2	The Inland Waterways Association-Middlesex Branch, Regents Network	No change proposed. OPDC considers Chicago Riverwalk to be an appropriate precedent.
P3/22	P3	Support approach to Grand Union Canal and proposal to implement a Conservation Area along its length.	15	London Borough of Ealing, Raymond Gill, Hammersmith and Fulham Historic Buildings Group, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P3/23	P3	Conflict between pedestrians and cyclists needs to be addressed along the towpath.	1	Bernie Timmins	Noted. To support the southern towpath's designation as part of the National Cycle Network and as a proposed TfL Quietway while reflecting width restrictions along its length,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					OPDC considers that OPDC's Public Realm, Walking and Cycling Strategy's recommendations to deliver a shared walking and cycling route is appropriate. This would be delivered in accordance with policy P3 and T2 which provides guidance to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.
P3/24	P3	In Policy P3 Grand Union Canal subsection o) i) there is a typo "twith".	1	Royal Borough of Kensington and Chelsea	Change proposed. Typo to be corrected.
P3/25	P3	Recommend that P3 is amended to reference the Water Framework Directive and the absolute requirement for changes not to result in deterioration of the waterbody and by including the improvement measures in the Infrastructure Delivery Plan.	1	Environment Agency	Change proposed. OPDC has made reference to the Water Framework Directive within the supporting text to Policy P3 and EU3.
P3/26	P3	Paragraph 165 of the NPPF promotes Planning Policies drawing on River Basin Management Plans and we feel that the Local Plan and relevant evidence base documents could be added to ensure that this is achieved.	1	Environment Agency	Change proposed. Policy EU3 has been amended to make reference to the Thames River Basement Management Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Seek to work with OPDC and the Canal and River Trust to understand what clean water discharge modifications may look like			
P3/27	P3	There is no information about funding developments on the Grand Union Canal.	1	Friary Park Preservation Group	No change proposed. Potential funding of infrastructure is set out in policy DI1. Funding of development will be provided by the relevant developer.
P3/28	P3	P3 should clarify future environmental controls for transporting waste via the canal.	20	Nicky Guymer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The supporting text has been amended to include new wording clarifying environmental controls for transporting waste via the canal.
P3/29	P3	The canal is an important space for green space, leisure, sport and creating an	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		attractive environment that preserves heritage.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P3/30	P3	Support Canal and River Trust comments for regulation 18 Local Plan.	13	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.
P3/31	P3	Support green corridor on north of the canal but this should go behind the warehouses.	13	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 P3 sets the principle for delivering a new Local Park along the Grand Union Union Canal. Further detailed work will need to be undertaken to identify the specific location and boundaries of the park.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/32	P3	Support proposal for buildings to be 6-8 storeys (maximum) but do not agree with taller elements at node points.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. To respond to public transport access and support legibility where key routes cross the canal, tall buildings are considered to be appropriate. Proposals for tall buildings at these locations will be considered on a site by site basis and will be determined using all other relevant planning policy and material considerations.
P3/33	P3	Support the use of the canal for heating and cooling.	13	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.
P3/34	P3	Oppose longer term moorings along the Grand Union Canal	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. OPDC considers that longer-term moorings alongside temporary and shorter term moorings will play a role in supporting the historic canalside character, meeting housing need and activating the canal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P3/35	P3	Support potential for boating and canoeing on the Grand Union Canal	13	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.
P3/36	P3	Marinas should be encouraged to activate the canal.	1	West Twyford Residents Association	Noted. Policy P3 supports the delivery of new basins and waterspaces.
P3/37	P3	The Local Plan should recognise that a local water transport service is being set up on the doorstep of the OPDC area. This is being delivered by the Mayor's London Waterways Commission Freight Group, in association with UCL University College London, the Commercial Boat Operators Association and the Just Space Network	1	Regents Network	No change proposed. OPDC considers P3 provides appropriate supporting guidance for water transport services.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/38	P3	The Local Plan does not adequately deal with the Grand Union Canal with limited mention of it.	1	Regents Network	No change proposed. OPDC considers that the provision of guidance for the Grand Union Canal in the Spatial Vision, Strategic Policies, P3 and relevant development management policies provides a sufficient level of detail and consideration of the canal.
P3/39	P3	The Local Plan should not be as supportive of canal moorings for residential boats	1	Regents Network	No change proposed. OPDC considers that residential moorings alongside other types of moorings will play a role in supporting the historic canalside character, meeting housing need and activating the canal.
P3/40	P3	Canal moorings should not be seen as a way of meeting need for homes	1	Regents Network	No change proposed. OPDC considers that residential moorings contribute to meeting housing need.
P3/41	P3	Should have a policy supporting the provision of a narrowboat hire centre	1	Regents Network	No change proposed. OPDC considers that specifically requiring the delivery of a narrowboat hire centre goes beyond the role of a Local Plan. Policy P3 provides guidance for the delivery of supporting infrastructure for moorings.
P3/42	P3	References to a Cycle Quietway along the Grand Union Canal should be removed. The Public Realm, Walking and Cycling Strategy does not come up with a workable solution for the quietway.	1	Regents Network	No change proposed. To reflect emerging proposals, OPDC considers it appropriate to make reference to the proposed TfL Quietway. OPDC also considers that OPDC's Public Realm, Walking and Cycling Strategy's recommendations to deliver a shared walking and cycling route is appropriate. This would be delivered in accordance with policies P3 and T2 which provide guidance to support the delivery of a high quality, safe, accessible and inclusive

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					walking environment across Old Oak and Park Royal.
P3/43	P3	Support use of Here East as a precedent	1	Regents Network	Noted.
P3/44	P3	Proposed walking/cycling route along canal in front of Powerday site would preclude movement of waste by water and conflict with other policies SP7 and EU6.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 sets the principle for delivering a new walking and cycling route along the northern edge of the Grand Union Canal. Further detailed work will need to be undertaken to identify the location and extent of this route.
P3/45	P3	It is unclear how the trend to more public activities and public spaces along the canal will be managed and married with the character of the canal corridor.		London Borough of Hammersmith and Fulham	No change proposed. OPDC considers Policy P3 to provide an appropriate level of guidance for a Local Plan for the use and character of the canal. OPDC is developing a Waterspace Strategy and is designating a conservation area for the full length of the canal within the OPDC area which will provide further guidance for the use and character of the canal.

P4: Park Royal West

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P4/1	P4	The Local Plan should make reference to the extant planning permission on the Twyford tip site	1	Ashia Centur Limited	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL).
P4/2	P4	Policy does not identify potential open spaces along the canal within Park Royal. Should prioritise delivering at least 10m either side of canal as open space.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P4 already refers to improving green spaces along the canal and Policy P3 sets out detailed criteria for the entire length of the Grand Union Canal including opportunities for green infrastructure. As detailed in the Heritage Study, the character of the canal varies along its length, and from a heritage perspective, it is recommended that the diversity of different sections of the canal - as open or enclosed; vibrant or tranquil - is maintained as far as possible. Delivering 10m of open space either side would be inappropriate as it would not recognise this context. It could also undermine the protection of Park Royal SIL. The preparation of a new Conservation Area appraisal and associated guidance would provide a means to explore this in more detail.
P4/3	P4	Policy should be revised to better anticipate the evolution in London Plan policy on protecting industrial land supply and delivering the type of industrial development that is needed.	1	London Borough of Ealing	Change proposed. Policies E1 and E2 have been amended to reflect the updated position in the Economy section of the new Draft London Plan. New industrial site allocations have also been introduced to support industrial intensification in SIL, based on evidence in the Park Royal Intensification Study. Policies P4 and P5 now refer to these site allocations.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P4/4	P4	The policy lacks an appreciation of the existing spatial characteristics of the area, especially in patterns of use and size of premises.	1	London Borough of Ealing	No change proposed. The Place boundaries identified are based on the different spatial characteristics across the area.
P4/5	P4	Park Royal is a prime location for a demand responsive bus service incorporating the tube stations on the periphery	1	London Borough of Ealing	Noted. The Transport policies do not prohibit this type of bus service being delivered, but OPDC is not responsible for the delivery of this transport function and therefore cannot influence this through the Local Plan.
P4/6	P4	CAZ is leading location for London businesses. Should clarify that Park Royal is London's leading location for industrial business.	1	Mayor of London	Change proposed. The text has been amended to clarify Park Royal's status as an industrial location.
P4/7	P4	Any development proposal along the length of Western Avenue should be required to deliver improvements to green infrastructure and frontages	1	DP9 (on behalf of A40 Data Centre BV)	Noted. This is already covered in SP9, P4, D2 and EU2.
P4/8	P4	There is a need for local hubs, supported by better wayfinding across the estate.	1	Park Royal Business Group	No change proposed. The provision of small scale 'walk to' services for industrial occupiers is covered in TCC1 and wayfinding is covered by T2 and T3.
P4/9	P4	New clusters should be identified at the area surrounding Harlesden and Stonebridge Park stations, with a vision promoting a		John Cox	No change proposed. The objectives to deliver intensification, positive and/or active frontages, a more attractive public realm, reduced car parking and the provision of small walk to uses outside of Park Royal Centre are considered in Local Plan

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		range of uses assisting with a transition into Park Royal.			policies (SP9, P4, P5, TCC1 and T4) and these would apply across the Park Royal area. OPDC will be preparing a Park Royal Supplementary Planning Document and this would provide an opportunity to set out more detailed guidance to support the implementation of the Local Plan.
P4/10	P4	Suggestion that areas identified for intensification should be highlighted in the plan.	1	John Cox	Change proposed. New industrial site allocations have been identified based on work undertaken as part of the Park Royal Intensification Study.
P4/11	P4	Support approach to tall buildings	1	Deloitte (on behalf of Mapletree Pte)	Noted.
P4/12	P4	The site known as the Twyford Tip West should be removed from SIL and identified as a site allocation in line with proposals in implemented planning permission. Policy text should reflect the implemented planning permission and land uses at the former Twyford Tip site.	1	Turley (on behalf of Ashia Centur Limited)	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL).
P4/13	P4	Support improvements in Policy P4		Turley (on behalf of Ashia Centur Limited); Hammersmith Society	Noted.
P4/14	P4	Park Royal area is not suitable for the application of Green Space Factor.		Friary Park Preservation Group	No change proposed. It is considered that all major development in the OPDC area should seek to maximise opportunities to increase urban greening and biodiversity. Further detail on how

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the urban greening factor will be applied will be included in an Environmental Standards SPD.
P4/15	P4	Policy is sound		Friary Park Preservation Group	Noted.

P4C1 Brewery Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P4C1/1	P4C1	The Twyford Abbey Road site was identified as a development site in the Reg 18 Local Plan, but it has not been in the Reg 19 Local Plan and it should be. It should be identified for residential development	1	Diageo Plc	No change proposed. The site is a designated open space delivered as part of an earlier phase of development at First Central. The open space is of good quality and provides green space, recreation and play space. OPDC does not consider it appropriate to allocate this site for redevelopment through the Local Plan. It is part of a larger coherent public open space of over 2ha in size, constituting a 'local park' as defined in the Mayor's London Plan. Any loss of this open space would need to accord with the requirements of policy EU1,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					and provide equivalent or better open space in terms of its quantity, quality and function.
P4C1/2	P4C1	Lakeside Drive site is difficult to deliver and could instead be used to off-set lost recreational uses from the Twyford Abbey Road site	1	Diageo Plc	No change proposed. The Lakeside Drive site ranges in width from 19 metres to 22 metres and is considered to be of sufficient width to provide a range of development typologies and to be deliverable. OPDC does not consider it appropriate or necessary through the Local Plan to designate the site as an open space to offset the loss of public open space elsewhere. In accordance with Policy EU1, if a loss of open space was proposed through a planning application then any replacement open space must provide equivalent or better open space in terms of its quantity, quality and function.
P4C1/3	P4C1	P4C1 should be amended to give greater flexibility and allow the market to direct the preferred use of the Diageo site.		Deloitte (on behalf of Mapletree Pte)	Change proposed. Policy E2 has been amended to protect employment uses outside of SIL unless certain criteria are met. The merits of each proposal would be assessed on a case by case basis. Policy P4C1 and the associated supporting text already provide flexibility in terms of the broad mix of uses that might be appropriate within this area.
P4C1/4	P4C1	Supports Figure 4.26 showing site as residential but location of active/positive frontages is too prescriptive.		Deloitte (on behalf of Mapletree Pte)	No change proposed. Policy P4C1 allows for changes over time by including a range of locations for active frontages and Policies SP9 and D2 seeks to maximise the use of active/positive frontages. These policies are considered to provide sufficient flexibility to accommodate change but also provide a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					necessary amount of detail to ensure the delivery of high quality development.

Place Policy P5: Old Park Royal

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P5/1	P5	Proposals to designate a new Conservation Area conflict with aims of SIL which seek to support industrial development. Some of the poor quality built fabric would benefit from being redeveloped.		London Borough of Ealing	No change proposed. OPDC's Heritage Study identified a group value to the cluster of heritage buildings and due to the relationship between these buildings and the street/spaces which is consistent with its original layout. The group value demonstrates that the area has special historic and architectural interest and as such it is considered appropriate to be proposed as a new conservation area. The boundary of the Conservation Area will be subject to a separate consultation exercise and the purpose of the conservation area is not to restrict development but to conserve and enhance the special qualities of the area, which should in turn support high quality and appropriate design. P5 also refers to the need to retain the urban grain and street pattern as this is a key feature of the area's historic makeup.
P5/2	P5	May not be possible to rationalise, minimise or remove on street parking. Park Royal	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents	No change proposed. Policy P5 recognises this by requiring these enhancements 'where possible and practicable'.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		has always relied on vehicle movement and is a hostile environment for pedestrians.		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	
P5/3	P5	Old Park Royal should be de-designated from SIL to allow for a wider range of uses to mediate transition between Old Oak and Park Royal	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Industrial Land Review and its Addendum set out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, the area's London-wide role, the loss of industrial land across London and the ongoing demand for industrial space.
P5/4	P5	Scope for intensification in Old Park Royal is limited	13	Old Oak Neighbourhood Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. This Study demonstrates that there are sites where it is possible to increase the amount of floorspace and jobs in Park Royal. The Local Plan identifies new industrial site allocations based on this work.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P5/5	P5	Policy on more generous pavements is desirable but unachievable.	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P5 recognises the challenges of increasing pavement widths in Old Park Royal by noting that it will be supported 'where this does not have a significant adverse impact on the functioning of the highway'.
P5/6	P5	Support the designation of the proposed St Leonards Road Conservation Area.	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The boundary of the proposed Conservation Area will be subject to a separate consultation exercise.

Place Policy P6: Park Royal Centre

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P6/1	P6	Sites at Acton Lane, in Park Royal Centre, should be identified for supported housing units given their proximity to the Hospital and their unsuitability for conventional residential development.	1	London Borough of Brent	Change proposed. Supporting text has been amended to reflect that planning permission has been granted for supported housing along Acton Lane. The Housing policies set out more detailed policies on supported housing.
P6/2	P6	Support place vision including increased shops and services, improved public realm, junction enhancements.	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	Noted.
P6/3	P6	Support Park Royal neighbourhood centre and support for a mix of uses such as the Hospital, new shared business focussed services, and other complementary uses	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd);	Noted.
P6/4	P6	Support recognition of the importance of Central Middlesex Hospital	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd);	Noted.
P6/5	P6	Site specific circumstances should be considered when assessing public and movement criteria in Policy P6.	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	No change proposed. Planning applications will be assessed on their individual merits against the policy objectives.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P6/6	P6	Support provisions to ensure local character is informed by the area's existing heritage.	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	Noted.
P6/7	P6	Should consider a linear centre with uses which animate and civilise the main route, and form part of a coherent spatial strategy for Park Royal	1	London Borough of Ealing	Change proposed. The Park Royal neighbourhood centre and the main routes forming the Big X have been considered as part of Park Royal Centre Development Framework Principles document. The Park Royal place policies take into account recommendations from this work and will ensure that development improves the appearance and experience of the public realm, as well as encouraging people to walk and cycle to/from Park Royal. A Park Royal SPD will be prepared to provide more guidance on implementing the place policies.
P6/8	P6	Mixed industrial-residential development should be supported in Park Royal Centre.	1	London Borough of Ealing	No change proposed. Policy P6 and supporting text already support a mix of uses as long they mitigate the impacts on the Strategic Industrial Location (SIL) and accord with other policies in the Plan.
P6/9	P6	Support idea of heart of Park Royal as a vibrant hub with retail, leisure, health and entertainment facilities. This would also be a suitable location for flexible, affordable office space suitable for start-ups and SMEs and spaces suitable	1	Park Royal Business Group	Noted. Policy E3 already supports workspaces for small businesses and start-ups.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		for business meetings and networking.			
P6/10	P6	Land within the Central Middlesex Hospital complex is not publicly accessible. Land to the rear of the site, which is owned by the NHS, may be suitable for open space	1	London North West Healthcare NHS Trust	Noted. The Park Royal Development Framework Principles document has considered the appropriate mix and location of land uses, including opportunities for open space. All relevant figures in the Local Plan have been updated accordingly.
P6/11	P6	Support policy to protect and enhance existing social infrastructure, including facilities at Central Middlesex Hospital	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. This is covered by policy TCC4.

P6C1: Asda Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P6C1/1	P6C1	Greater emphasis could be given to the role of Central Middlesex Hospital as a major employer and catalyst for the regeneration in OPDC	1	NHS London Healthy Urban Development Unit	Change proposed. Additional supporting text to P6 has been added to reflect the importance of Central Middlesex hospital.
P6C1/2	P6C1	Support Policy	1	London North West Healthcare NHS Trust	Noted.

Place Policy P7: North Acton and Acton Wells

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7/1	P7	Imperial supports policies for both student accommodation and new homes in this place, especially affordable, for both students and staff. Imperial also recognises the role well designed tall buildings can play in this and other areas.	1	Imperial College	Noted.
P7/2	P7	General support for policy P7	4	Osbourne Investments Limited and Quattro Holdings Limited, Citrus Group and Fuller Smith & Turner, London Borough of Ealing, Friary Park Preservation Group	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7/3	P7	Land take for Old Oak High Street should be minimised so that the developability of adjacent sites is not compromised.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. Land required to deliver Old Oak High Street will be defined based on identified need to support transport modes and delivery of Healthy Street aspirations and a high quality place.
P7/4	P7	Policy should be more specific on location for tall buildings, and should identify the Boden House site as suitable for tall buildings.	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. Policy SP9 had been amended to accord with requirements of London Plan policy D8 to define locations of tall buildings. The figure supporting this policy defines Boden House as a location appropriate for tall building in principle.
P7/5	P7	The Boden House site has the potential to deliver significantly higher housing numbers than identified in the site allocations table.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Victoria Road and Old Oak Lane Development Framework Principles development capacity assessment. The homes capacity figures are minimum figures and additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.
P7/6	P7	The Elizabeth Line rail spur has not been proved feasible or financially viable, and is not	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		safeguarded by appropriate bodies. Safeguarding of the line has major impacts on the developability of the site, and clarify is required on its feasibility.			decision to explore the delivery of the West London Orbital Line. As these two elements are mutually exclusive, references to safeguarding land to facilitate delivery of the spur have been removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for West London Orbital Route Line in Acton Wells.
P7/7	P7	The safeguarding of the Quattro Site for waste management purposes following release by HS2 is not compatible with the vision for the Place and Old Oak High Street. Policy should refer to the possibility of the waste site being relocated.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. The current version of the West London Waste Plan safeguards the site. This is Development Plan policy. However, OPDC will be working with the West London Waste Authorities to update the West London Waste Plan to align with the draft London Plan waste apportionment figures and the continued designated of this site for waste apportionment purposes will be reviewed as part of this.
P7/8	P7	The policy and the text in the table (page 101) should be amended to be consistent with representations on Policy P7C2 and Policy P8.	1	Castlepride Limited	Noted. Refer to OPDC's responses to these issues.
P7/9	P7	Greater detail should be provided on the potential Elizabeth Line-WCML spur to aid understanding.	1	Transport for London (Group Planning)	Change proposed. Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the decision to explore the delivery of the Chiltern Line. As these two elements are mutually exclusive, references to safeguarding land to facilitate delivery of the spur have been

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for the Chiltern Line in Acton Wells.
P7/10	P7	Strongly object to proposed local listing of The Castle. The Castle pub has not previously been identified worthy of local listing and nothing has occurred recently to suggest it should be. Change to surrounding areas does not affect the historic significance of The Castle Pub. The building is unremarkable and there are many other examples of buildings typical of this era.	1	Citrus Group and Fuller Smith & Turner	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designation as a non-designated heritage asset on OPDC's forthcoming Local List. This is based on the recognition that it has historic, townscape, architectural and social significance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form. OPDC consulted on the Local List in early 2018.
P7/11	P7	Change in the area from one of industry and rail and road networks should not be cited as a reason for retaining buildings with little or no historic value which could undermine delivery of development	1	Citrus Group and Fuller Smith & Turner	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designation as a non-designated heritage asset on OPDC's Local List. This is based on

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the recognition that it has historic, townscape, architectural and social significance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form.
P7/12	P7	Support for a mixed use town centre.	1	London Borough of Ealing	Noted.
P7/13	P7	It is necessary to be explicit that the routes connecting North Acton and Old Oak need to be direct and legible and ensure North Acton is integrated with Core Old Oak Common area.	1	London Borough of Ealing	Noted. Policies SP7, T1 and T2 also provide guidance to ensure routes are high quality.
P7/14	P7	Support the policy of ensuring a balanced approach to student housing.	1	London Borough of Ealing	Noted.
P7/15	P7	Proposals for public realm are welcomed.	1	London Borough of Ealing	Noted.
P7/16	P7	Policy should set clear objectives for the upgrade of North Acton Station.	1	London Borough of Ealing	No change proposed. OPDC considers the guidance set out in P7C1 to be sufficiently detailed for the role of a Local Plan to support future upgrades to North Acton Station
P7/17	P7	Publicly accessible open space policies need to provide clearer guidance for the roles of open spaces to deliver playing fields.	1	Sport England	Change proposed. Policies SP8 and EU1 provide guidance for delivering multifunctional open spaces. Policy EU1 has been amended to include the need for playing fields as part of open space provision. Policy P7 provides

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					place specific guidance for open spaces appropriate to the role of a Local Plan.
P7/18	P7	The promotion of tall and high density development on the Victoria Industrial Estate, and reference to a minimum rather than target/maximum number of homes is supported.	1	SEGRO	Noted.
P7/19	P7	These comments have not been published due to inappropriate content.	1	Ron Thorp	N/A
P7/20	P7	Dull and dismal in the extreme.	1	Ron Thorp	Noted. Policy P7 provides place specific guidance to deliver a high quality built environment.
P7/21	P7	Towers in North Acton should be knocked down and replaced with buildings of lower heights.	1	Ron Thorp	No change proposed. North Acton has already been established as a place for tall buildings and this approach will continue to be supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations.
P7/22	P7	Recently developed housing units are too small.	1	Ron Thorp	Noted. Policy H3 requires all self-contained housing to meet London Plan and national housing space standards.
P7/23	P7	Para NA.14 regarding improving air quality should be	6	Joanna Betts, Francis, Marc and Caroline Sauzier, Lily Gray, Wells	No change proposed. Policy P7 provides guidance for improving air quality based on OPDC's Air Quality Study.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		strengthened, and the text should be included in policy.		House Road Residents Association, Catherine Sookha, Thomas Dyton	
P7/24	P7	Site for secondary school should be allocated/safeguarded within North Acton even if it is not required until after the plan period.	1	Diocese of London	No change proposed. Policy P7 requires development to contribute to the delivery of infrastructure requirements as set out in the OPDC's Infrastructure Delivery Plan.
P7/25	P7	Development in North Acton has been of poor quality.	15	Hammersmith Society, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Ron Thorp	Noted. London Plan policies and Local Plan policies SP8, D1, D4, D5 and P7 provide guidance to deliver a high quality built environment.
P7/26	P7	Additional student housing in North Acton is not supported as there is already an overconcentration.	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia	Noted. Policy P7 seeks to deliver appropriate levels of student accommodation in accordance with Policy H10. Policy H10 sets out guidance to ensure student accommodation contributes positively to an area by requiring proposals to contribute to the vibrancy and diversity of an area, by

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	locating development in areas of high PTAL, to not undermining the delivery of conventional self-contained housing supply and to not result in an overconcentration in any one specific location.
P7/27	P7	It is important that the connection between Acton Wells and Old Oak South and the Old Oak Common Lane Station are designed well	15	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP7, P1, T1 and T2 also provide guidance to ensure routes are high quality.
P7/28	P7	The Plan should not identify P7 as a strategic policy, allowing a neighbourhood plan's policies to take precedence.	15	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P7/29	P7	Policy does not discourage a mono-type of housing (student housing) being delivered in North Acton	1	Harlesden Lets	Noted. Policy P7 seeks to deliver appropriate levels of student accommodation in accordance with Policy H10, which requires schemes to not result on an overconcentration of student accommodation in one location.
P7/30	P7	Figure 4.33 Use of Kings Cross as a precedent as it is not well planned or generous in terms of open space provision.	1	Regents Network	No change proposed. OPDC considers Kings Cross to be an appropriate precedent which provides a range of high quality publicly accessible open spaces.
P7/31	P7	Figure 4.34 Information supporting the precedent is nondescript and a better photo is needed.	1	Regents Network	No change proposed. OPDC considers the description of figure 4.34 to be appropriately detailed and of a sufficient quality.
P7/32	P7	North Acton tall buildings do not relate to surrounding context. Additional residents	13	Grand Union Alliance, Wells House Road Residents Association,	No change proposed. North Acton has already been established as a place for tall buildings and this approach will continue to be

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		will have an impact on social infrastructure		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	supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations. Requirements for developers to contribute to social infrastructure are set out in Policy TCC4.

P7C1: North Acton Town Centre Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7C1/1	P7C1	Policy should emphasise the importance of station improvements at North Acton in providing and the role it should play in the areas enhancement.	1	Transport for London (Group Planning)	No change proposed. OPDC considers Policy P7C1 provides significant emphasis for delivering improvements to North Acton Station.
P7C1/2	P7C1	North Acton Station Square should be referred to as "potential", not existing.	1	Transport for London (Group Planning)	No change proposed. North Acton Station Square is due to be completed in 2018. As such OPDC does not consider it appropriate to refer to the open space as potential.
P7C1/3	P7C1	General support for policy P7C1	1	Friary Park Preservation Group	Noted.

P7C2: Old Oak Common Lane Station Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7C2/1	P7C2	The Plan should require the provision of an underground tunnel linking Old Oak Common station and the Old Oak Common Lane Overground station. This could be used for removal of spoil and then as a pedestrian connection between the two stations	1	West London Line Group	No change proposed. Policy P7C2 requires proposals to continue Old Oak High Street, integrate with the station and with the station square to the west of the station. The exact nature of this connection could be over or under the London Overground Lines. It should be noted that TfL have explored both an underpass and overbridge option and recently consulted on their preferred option as an overbridge.
P7C2/2	P7C2	Midland Gate site can help deliver the Old Oak High Street Link	1	Castlepride Limited	Noted.
P7C2/3	P7C2	Final station design proposals for proposed Old Oak Common Lane Overground station are still to be developed, and the station should be referred to as "potential".	1	Transport for London (Group Planning)	Change proposed. The word 'potential' has been inserted into the text.
P7C2/4	P7C2	The supporting text (OCL.5) should not be too prescriptive and should recognise that development at Midland Gate could proceed in advance of Old Oak Common Lane Station.	1	Castlepride Limited	Change proposed. This wording has been removed.
P7C2/5	P7C2	Text needed to reflect that works on surface links between Old Oak Common	1	Transport for London (Group Planning)	Change proposed. Has been amended to reflect that works on surface links between Old Oak Common Station and the potential

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Station and the potential Overground station is subject to ongoing work. Welcome reference seeking to ensure feasibility of route between Old Oak South and Acton Wells.			Overground station is subject to ongoing work.
P7C2/6	P7C2	Lack of government funding a concern.	1	Friary Park Preservation Group	Noted. Policy DI1 sets out the proposed approach to secure funding, including public sector funding.
P7C2/7	P7C2	Object to TfL proposals for a cycle/pedestrian bridge crossing, rather than a tunnel, at Old Oak Common Lane Station.	19	Nicky Guymer, Bruce Stevenson, Mark Walker, Dave Turner, Midland Terrace Residents, TITRA, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is continuing to work with TfL to reflect outputs of the ongoing studies and consultation processes for the design and delivery of Old Oak Common Lane Station and associated connection between Acton Wells and Old Oak South.
P7C2/8	P7C2	Support proposed Old Oak Common Lane Overground Station	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P7C2/9	P7C2	Midland Terrace, Shaftesbury Gardens and Wells House Road are within the Old Oak Neighbourhood Area. Over-detailed policies will conflict with NPPF guidance on avoiding 'duplication' and also risks including policies that are inappropriate for a Local Plan which would not normally be revised within 5 years. P7 and P7C2 should not be strategic policies.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.

Place Policy P8: Old Oak Lane & Old Oak Common Lane

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/1	P8	Should require HS2 to provide acoustic glazing and air conditioning for all houses on Wells House Road	12	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. HS2's mitigation and compensation arrangements are governed through HS2 Ltd's own arrangements and are not a matter for the Local Plan.
P8/2	P8	Retaining wall next to Wells House Road should be rebuilt as a green wall	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The exact nature of the reprovision of any wall is too detailed an issue for the Local Plan, but could be something covered through a Neighbourhood Plan.
P8/3	P8	The plan should note that Wells House Road will be at the centre of HS2 and other construction activities for the next 20-30 years	12	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 Local Plan references the need to mitigate construction impacts in this Place. Other residential communities will also be at the centre of construction activities in this Place. It is not considered necessary to identify that a particular road will be adversely affected.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
P8/4	P8	Development opportunity at Midland Gate should be recognised in the policy text.	1	Castlepride Limited	Change proposed. The supporting text has been amended to reflect development potential of Midland Gate.
P8/5	P8	Policy should be amended to not preclude potential for tall buildings on the Midland Gate site.	1	Castlepride Limited	Noted. OPDC has developed the Tall Buildings Statement to accord with Draft New London Plan policy D8. This sets out the process for how locations where tall buildings will be appropriate in principle. Midland Gate is not currently identified as an appropriate location. The Statement recognises that these locations may change and will inform future updates to the Local Plan.
P8/6	P8	Correct reference is Willesden Junction Bus Garage. Support retention of SIL designation and bus garage use for Willesden Junction Bus Garage.	1	Transport for London (Group Planning)	Change proposed. Wording in the Local Plan refers to Willesden Junction Bus Garage
P8/7	P8	Old Oak Lane/Victoria Road is currently the only road link between east and west parts of OPDC.	1	London Borough of Ealing	Noted.
P8/8	P8	Island Triangle area should not be surrounded by high rise development.	1	Bernie Timmins	Noted. Policy P8 identifies that generally lower heights directly adjacent to the Island Triangle are appropriate. This policy will be implemented alongside national guidance, London Plan policies and Local Plan policies SP9, D4, D5 and D6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/9	P8	More attention should be paid to preservation of the railway cottages, and planning should not be granted for extensions or other proposals which damage the built character of the buildings.	1	Bernie Timmins	Noted. Policy P8 provides guidance to ensure the Old Oak Lane Conservation Area is conserved and enhanced. OPDC is also working with The Island Triangle Residents Associated to refresh the guidance for the Old Oak Lane Conservation Area in due course.
P8/10	P8	There is a need for new green spaces around the Island Triangle to act as a buffer between the HS2 works and residential buildings.	1	Bernie Timmins	Noted. Policy P8 seeks to enhance and expand the Old Oak Community Gardens adjacent to The Island Triangle and seeks to deliver linear spaces along Old Oak Lane.
P8/11	P8	Implementation of the Oaklands scheme and its contribution to the delivery of P8's vision should be referenced in supporting text paragraph OOL.3.	1	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. Following completion of the Oaklands development it will be depicted as an existing residential neighbourhood.
P8/12	P8	Former Railway Institute building, Goodhall industrial units and adjacent Network Rail land can be a gateway into Old Oak delivering mixed use development. This would require demolition of locally listed FRI building and existing industrial buildings	1	Raban Goodhall Ltd	Change proposed. Following development of further evidence base, the Goodhall industrial units have been removed from SIL. This will facilitate mixed use development.
P8/13	P8	General support for policy P8	3	Raban Goodhall Ltd, Victoria Hollertz, Friary Park Preservation Group	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/14	P8	P8 should made reference to its proximity future transport investment at Willesden Junction.	1	Raban Goodhall Ltd	No change proposed. Policy P8 vision makes reference to the place connecting Willesden Junction Station with Wormwood Scrubs and East Acton.
P8/15	P8	FRI building still requires improvement but costs of further improvements are expensive and affect viability of developing the site. Retention of the FRI building is more likely if adjacent sites are developed for mixed use.	1	Raban Goodhall Ltd	Noted. The Former Railway Institute building is located within the Old Oak Lane Conservation Area. As such it is part of a designated heritage asset. Proposals to develop designated assets are required to accord with NPPF paragraph 133 which requires local planning authorities to refuse total loss or substantial harm of designated heritage assets unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or viable reuse cannot be achieved. The building is also proposed for inclusion on OPDC's Local List.
P8/16	P8	Improvements to Old Oak Lane, should be particularly focused on improving public realm for walking and cycling and slowing/deprioritising vehicle movements such as a green buffer/large planters, wider pavements, cycle lane).	1	Victoria Hollertz	Noted. Policy P8 seeks to deliver a high quality public realm with improved walking and cycling infrastructure.
P8/17	P8	The route into the Channel Gate area should be via Atlas Road and a bridge over the canal. Channel Gate Road	21	Victoria Hollertz, Nicky Guymmer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood	Noted. OPDC will work with HS2 and TfL to explore the potential to redirect construction traffic to help minimise impacts on to the Island Triangle residential neighbourhood.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		currently carves historic Goodhall Street in two. Old street pattern should be restored.		Forum, Dave Turner, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P8/18	P8	Strongly support deliver of new and expanded green open spaces Old Oak Lane and Old Oak Common Lane	1	Victoria Hollertz	Noted.
P8/19	P8	Support improving air quality but policy needs to be stronger. Increasing the amount of waste Powerday can manage would be disastrous for residents and their health. Regulation has failed to address issues with local air quality, dust and odour.	1	Victoria Hollertz	Noted. Policy EU4 and table 6.1 provide policy for minimising air pollution and making a positive contribution to overall improvement in air quality. Policy EU5 provides policy for mitigating impacts of noise and vibration.
P8/20	P8	Strongly support this policy of lower building height near Old	1	Victoria Hollertz	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Oak Lane/Island Triangle and/or green buffer			
P8/21	P8	The promotion of building heights and high density development on the Westway Estate, and reference to a minimum rather than target/maximum number of homes is supported.	1	SEGRO	Noted.
P8/22	P8	Policy is unsound	1	Sarah Abrahart	No change proposed. OPDC considers the policy is sound.
P8/23	P8	Support having a separate place for Old Oak Lane and Old Oak Common Lane.	13	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.
P8/24	P8	Support the recognition that there needs to be sensitive integration between existing and new development.	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P8/25	P8	A buffer zone is needed between the existing residential areas and new development in Old Oak South	16	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Lori Wiechec, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The policy identifies that generally lower heights directly adjacent to existing residential areas are appropriate. This policy will be implemented alongside national guidance, London Plan policies and Local Plan policies SP9, D4, D5 and D6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/26	P8	Support the identification of Atlas Junction Neighbourhood town centre	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P8/27	P8	Should remove the restriction of town centre uses to sites only within the town centre. This approach is overly rigid.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The definition of a town centre hierarchy and provision of policies to deliver a sequential approach for the location of town centre uses accords with NPPF paragraph 24. This supports a town centre first approach. Taking an alternative approach would not be consistent with the NPPF or in general conformity with the London Plan.
P8/28	P8	P8c) for the Harlesden Bus Depot should not be considered strategic so that a neighbourhood plan can set the appropriate land uses for the site	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P8/29	P8	Designation of SIL has not been applied consistently. Explanation for releasing the Westway Estate from SIL but retaining Old Park Royal as SIL is required.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The release of SIL designation with the wider Old Oak area, including the Westway Estate is set out in London Plan Opportunity Area guidance, the Old Oak and Park Royal Opportunity Area Planning Framework and the Industrial Land Review supporting study. This reflects the development opportunities presented by Old Oak Common Station. This opportunity is reflected in OPDC's Industrial Lane Review which sets out an evidence based approach for the release of SIL.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/30	P8	If plans to widen Victoria Road are carried out, mitigating action should be taken to replace lost trees and vegetation.	1	Douglas Hunt	Noted. Policy P8 seeks to mitigate the impacts of HS2 and construction within the design of public realm. Policy EU1 and EU2 also seek to manage the loss of street planting and open spaces.
P8/31	P8	The costs and complexities of the Victoria and Westway estates means that viability will be more important on these sites than perhaps other sites in the area which have already been obtained for the purpose of redevelopment for an alternative use.	1	SEGRO	Noted.
P8/32	P8	A key challenge in the delivery of Victoria and Westway site allocations is the ability to provide new industrial space within the OPDC area, so that existing businesses at the estates can be decanted into new premises.	1	SEGRO	Noted. OPDC will work closely with land owners and tenants to retain or reprovide employment floorspace in new development.
P8/33	P8	Harlesden Bus Depot should be dedesignated as SIL due to: Isolation from wider Park Royal Considered to be part of Harlesden	1	Harlesden Neighbourhood Forum	No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits:

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		<p>Adjacent to residential areas Adjacent to Harlesden Town Centre Shop units fronting onto Station Road within SIL Derelict building in west of depot Environmental impact on surrounding areas Site needs to support movement to/from Old Oak along Station Road.</p> <p>Dedesignation of Harlesden Bus Depot from SIL would allow for site to be redeveloped in the long term if the bus depot could be satisfactorily relocated nearby. OPDC should allocate land elsewhere for the bus depot.</p>			<p>Secures sustainable transport services to serve existing and planned growth; Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; Employment of over 300 people with training facilities.</p> <p>OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the SIL designation. Relevant policy components include:</p> <ul style="list-style-type: none"> - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space <p>OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/34	P8	Policy E1 would prevent delivery of shops or cafes on to Station Road. Positive frontages won't contribute to supporting movement to Old Oak.	1	Harlesden Neighbourhood Forum	No change proposed. Supporting text to policy P8 clarifies the form of town centre uses appropriate to delivery active frontages which will ensure consistency with E1 and conformity with London Plan SIL policies.
P8/35	P8	Recognise loss of SIL across west London is an issue and that the Mayor will be restricting this. Suggest dedesignation is a balancing act between uses and priorities. There should not be a blanket refusal to refuse dedesignation. Loss of 1.2 hectares of SIL would not significantly impact industrial land supply.	1	Harlesden Neighbourhood Forum	<p>No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits:</p> <p>Secures sustainable transport services to serve existing and planned growth; Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; Employment of over 300 people with training facilities.</p> <p>OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>SIL designation. Relevant policy components include:</p> <ul style="list-style-type: none"> - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space <p>OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.</p>
P8/36	P8	The Mayor supports the SIL designation and retention of the Willesden Junction bus garage.	1	Mayor of London	Noted.
P8/37	P8	Sites at Goodhall Street should also be taken out of SIL to enable the comprehensive redevelopment of the area	1	Boyer Planning	Change proposed. The Industrial Land Review and Addendums have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
P8/38	P8	High Street connection across Old Oak Common Lane would have massive impact on neighbouring communities and	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. The Local Plan promotes an east-west connection between North Acton, the proposed Old Oak Common Lane station and the HS2 station. The Local Plan does not specify whether this would be a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		tunnelled option would be a preference.		Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	bridge or tunnel connection but any proposal would need to accord with planning policy, being well designed and appropriately responding to the surrounding context.

P8C1: Atlas Junction Town Centre Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8C1/1	P8C1	Support paragraph AJ.7	1	Victoria Hollertz	Noted.
P8C1/2	P8C1	General support for policy P8C1	1	Friary Park Preservation Group	Noted.
P8C1/3	P8C1	Policy P8C1 it too detailed to be a strategic policy within a Local Plan in light of NPPF para 185 as this location falls within the Old Oak Neighbourhood Area and will have guidance provided within a future neighbourhood plan. Policy P8C1 should be removed from the Local Plan.	14	Old Oak Interim Neighbourhood Forum, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P8C1/4	P8C1	The Old Oak Neighbourhood Forum will be working with the new occupants of the Collective building, the Oaklands development (construction starting 2018) and the Harlesden Neighbourhood Forum on plans for an area in which existing and new residential and commercial buildings need to be integrated sensitively.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will support the development of any neighbourhood planning guidance for the area in accordance with national guidance and Policy DI3.

Place Policy P9: Channel Gate

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P9/1	P9	Principal consideration in developing Channel Gate	1	London Borough of Ealing	No change proposed. Policy P9 vision and policy seek to respond to and mitigate impacts

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should protecting amenity of current residents and maximising potential.			on adjacent residents. Policy D6 also provides guidance to provide an appropriate standard of amenity.
P9/2	P9	Channel Gate can act as an exemplar for SIL intensification and in making a successful transition between industrial zones and the core of Old Oak.	1	London Borough of Ealing	Noted. Policy P9 vision reflects this aspiration.
P9/3	P9	Policy acknowledges key responsibility to conservation area at Old Oak Lane.	1	London Borough of Ealing	Noted.
P9/4	P9	Policies to preserve and enhance Plantagenet House are unsound as HS2 Ltd was granted powers demolish this building as part of the HS2 Act.	1	HS2 Ltd.	<p>Change proposed. OPDC's Heritage Strategy identifies Plantagenet House to have heritage significance that warrants its proposed designation as a locally listed heritage asset. Establishment of the Local List was subject to public consultation in 2018. OPDC is aware of the powers resulting from the HS2 Act and continue to consider that Policy P9 and D8 are consistent with NPPF paragraph 135 regarding non-designated heritage assets.</p> <p>However, OPDC has amended the supporting text to policy P9 to provide further information for how conserving and enhancing Plantagenet house could be implemented to reflect powers of the HS2 Act.</p>
P9/5	P9	Policy should explicitly state that the area will be subject to a	1	London Borough of Ealing	No change proposed. OPDC will consider whether additional supplementary planning guidance is suitable for Channel Gate in due

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		specific planning framework when released by HS2.			course. OPDC's Local Development Scheme will reflect this work.
P9/6	P9	Island Triangle should be improved and public open space should be provided. Railway cottages should be enhanced to add character to the area.	1	Tim Potter	Noted. Policy P8 provides guidance to enhance the Island Triangle.
P9/7	P9	Strongly support policy to activate area for meanwhile uses	1	Victoria Hollertz	Noted.
P9/8	P9	There should be improved noise and air quality mitigation and screening to reduce impact from retained strategic freight use.	1	Victoria Hollertz	Noted. Policies D6, P9 and P8 provide guidance to this effect.
P9/9	P9	Designation of parts of Channel Gate place as SIL is inflexible and conflicts with other policies.	20	Nicky Guymmer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, Midland Terrace Residents, TITRA, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Channel Gate is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 and to continue to provide strategic functions as a rail freight site. This is reflected in OPDC's Industrial Land Review which sets out an evidence based approach for the release and retention of SIL.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P9/10	P9	The eastern part of Channel Gate forms part of the designated Old Oak Neighbourhood Area. Over-detailed policies will conflict with NPPF guidance on avoiding 'duplication' and also risks including policies that are inappropriate for a Local Plan which would not normally be revised within 5 years.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P9/11	P9	P9 is not justified as it lacks guidance for building heights.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Guidance for building heights is provided in Policy P9. This reflects the evidence base for buildings heights set out in the Grand Union Canal Heights and Massing Note and the Park Royal Intensification

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Strategy. It also reflects the development timescales for Channel Gate. HS2 currently safeguards the area for construction activities until 2026. In preparation for the release of safeguarding, OPDC may consider the need for additional evidence base and building heights guidance.
P9/12	P9	Support for the creation of a permeable street network in Channel Gate	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P9/13	P9	Question if waste sites on Channel Gate have been properly regulated.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Any waste management facilities will need to accord with policy EU6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
P9/14	P9	Support designation of part of Channel Gate place within the Old Oak Neighbourhood Area.	13	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	Noted.

Place Policy P10: Scrubs Lane

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/1	P10	An extra 350m of active frontage at Harrow Road/Scrubs Lane could result in over 5,000sqm of town centre floorspace, which could impact significantly on Harlesden Town Centre	13	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 - the requirement for a Harlesden Enhancement Strategy has been amended so that it applies to all places. It is now covered in Policy TCC1.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/2	P10	OPDC should use the Old Oak Masterplan process to deliver a suitable contextual response; a consideration of potential less damaging alternatives; measures to minimise or mitigate potential harm, and; shape a coherent building heights strategy along Scrubs Lane.	1	Historic England	Noted. OPDC considers that the Scrubs Lane Development Framework Principles provides appropriate guidance, including a coherent building heights strategy, that is informed by the local context and considers the impact on the significance of heritage assets within and around the OPDC area.
P10/3	P10	It isn't clear if suggested cycle and pedestrian routes along Scrubs Lane are existing or proposed. If proposed, then such improvements would be difficult to deliver without encroaching on the Scrubs which is highly objectionable. Current entrance points to Wormwood Scrubs from Scrubs Lane are appropriate and no additional access points are required.	15	The Friends of Wormwood Scrubs, Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC has amended the policy to provide flexibility in its implementation.
P10/4	P10	Further recognition is required for flexibility in planning policy when seeking to bring forward early development including when seeking to deliver housing above the ground floor.	1	Remavon	No change proposed. OPDC considers Policy P10 and other Local Plan policies to be sufficiently flexible to support early development.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/5	P10	Flexibility is required for policies seeking sites to deliver new/improved pedestrian and cycle routes so that they do not unduly impact on the development potential of specific sites.	1	Boropex Holdings Limited	No change proposed. The location and form of walking and cycling routes set out in P10 is justified by the Scrubs Lane Development Framework Principles and informed by transport supporting studies. OPDC considers that the level of detail provided within P10 is appropriate to the role of a Local Plan to guide development proposals.
P10/6	P10	Support P10(g)	1	Boropex Holdings Limited	Noted.
P10/7	P10	Support P10(i)	1	Boropex Holdings Limited	Noted.
P10/8	P10	Policy restricting one tall building in each cluster on Scrubs Lane is too restrictive, does not accord with London Plan policy 7.7 and has already been contravened by recently permitted schemes.	1	Boropex Holdings Limited	No change proposed. The approach to tall buildings along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. This approach accords with London Plan policy 7.7(A) by ensuring the guidance for tall buildings is part of a plan-led approach to developing Scrubs Lane by identifying appropriate, sensitive and inappropriate locations for tall buildings. Currently permitted schemes accord with the guidance set out in P10.
P10/9	P10	Figure 4.49 is overly prescriptive, in particular the requirements illustrated for public open space and public access routes. It should be revised to show a reduced	1	Boropex Holdings Limited	No change proposed. The London Plan Appendix states that all figures in the Local Plan should be treated as indicative. The introduction to the Places Chapter confirms that place policy figures are diagrams. Figure 4.49 and the indicative amount of publicly accessible

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		amount of public open space, and a statement should be inserted clarifying that the diagram is indicative only.			open space is based on recommendations set out in the Scrubs Lane Development Framework Principles. As such OPDC considers the indicative amount of publicly accessible open space depicted in figure 4.49 is appropriately justified and appropriate for the role of a Local Plan.
P10/10	P10	Policy should be reworded so as not to specifically mention / show the public space at junction of 115-129 Scrubs Lane and remove green arrow through this space.	1	Boropex Holdings Limited	<p>Change proposed. To provide clarity regarding the role of the space between 115-129 Scrubs Lane and Mitre Wharf, the diagram supporting Policy P10C4 will be amended to remove the public open space in this location.</p> <p>No change proposed. The locations of the green arrows depicting pedestrian/cycling routes are based on recommendations set out in the Scrubs Lane Development Framework Principles to support connectivity to the publicly accessible open space.</p>
P10/11	P10	It may not be appropriate for the easterly block on Mitre Wharf site to include active uses.	1	Boropex Holdings Limited	Change proposed. To reflect the quieter character of this area, positive frontages have been shown in figure supporting Policy P10C4.
P10/12	P10	The identification for a 3.5m route for walking and cycling either side of the canal within the Grand Union Canal Massing and Enclosure Note is overly generous for the Mitre Wharf site, and should be	1	Boropex Holdings Limited	No change proposed. The Grand Union Canal Massing and Enclosure Note sets out indicative cross sections, assuming 3.5 metres on either side of the Grand Union Canal across its length. This is used to inform appropriate height to width ratio to define general heights for development facing on to the canal. It does not

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		integrated with open space provision.			set out guidance requiring 3.5 metre wide walking/cycling along the northern edge of the canal. Guidance for delivering this route is provided in Policy P3 which does not define an envisaged width.
P10/13	P10	Support P10C4(d)(e)	1	Boropex Holdings Limited	Noted.
P10/14	P10	As currently worded, policy suggests views through the mitre wharf site to/from the Cemetery and Mitre Bridge should be protected. While the setting of these assets should be respected, the connecting view does not merit a need respected and policies suggesting that they should be deleted. Evidence has been provided setting out rationale for removing parts (e)(ii) and (iii).	1	Boropex Holdings Limited	Change proposed. To ensure correct referencing, Policy P10C4 has been amended to make reference to Scrubs Lane overbridge. Change proposed. Policy P10C4 has been amended to remove references to views between heritage assets.
P10/15	P10	Support intention to provide improved cycle facilities and bus corridor reliability.	1	Transport for London (Group Planning)	Noted.
P10/16	P10	Policy wording should be clearer regarding delivering development after the plan period and that any proposals for future development of the North Pole Depot will need to	1	Transport for London (Group Planning)	No change proposed. Policy SP9 sets out phasing of development reflecting the North Pole East Depot being delivered after the plan period.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		take account of future operational needs.			
P10/17	P10	Support vision for early delivery at Scrubs Lane.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
P10/18	P10	Support for 1,100 new jobs and a minimum of 2,000 new homes during the plan period including early development	1	Fruition Properties	Noted.
P10/19	P10	Support for small business employment uses fronting Scrubs Lane	1	Fruition Properties	Noted.
P10/20	P10	Retail uses could also be appropriate along the length of Scrubs Lane	1	Fruition Properties	No change proposed. To support the vitality of Scrubs Lane, delivery of employment floorspace and ensure retail units benefit from sufficient footfall, retail uses are focused within clusters at new and improved east-west routes.
P10/21	P10	Support residential uses on upper floors of Scrubs Lane	1	Fruition Properties	Noted.
P10/22	P10	There should be flexibility on building heights	1	Fruition Properties	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations.
P10/23	P10	Part (f) and paragraph SL.6 should make reference to Kensal Canalside Opportunity Area.	1	Royal Borough of Kensington and Chelsea	Change proposed. Amendments have been made to the policy.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/24	P10	Evidence base for tall buildings along Scrubs Lane is not sufficient should give more consideration to the impact of tall buildings along Scrubs Lane on the St Mary's and Kensal Green Cemeteries.	16	Royal Borough of Kensington and Chelsea, Old Oak Interim Neighbourhood Forum, Historic England, Hammersmith and Fulham Historic Buildings Group, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. This approach accords with London Plan policy 7.7(A) and Draft New London Plan policy D8 in defining locations of tall buildings.
P10/25	P10	Scrubs Lane is currently unpleasant and has poor amenity.	1	A Somefun	Noted. Policy P10 provides place specific policies to address these issues.
P10/26	P10	Policy is unsound	1	Sarah Abrahart	No change proposed. OPDC considers the policy is sound.
P10/27	P10	More buses are needed along Scrubs Lane	1	ArtWest	Noted. Policy T6 requires proposals to facilitate, deliver and contribute to bus infrastructure.
P10/28	P10	Support policy.	1	ArtWest	Noted.
P10/29	P10	Guidance for a tall building in each clusters needs further detail.	1	ArtWest	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					movement routes, public transport access and sensitive locations. A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. This approach accords with London Plan policy 7.7(A) and Draft New London Plan policy D8 in defining locations of tall buildings.
P10/30	P10	Plan to develop south of the Grand Union Canal on the Mitre Industrial Estate is illogical and is not positively prepared or justified.	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Proposals for redevelopment of the Mitre Industrial Estate is based on evidence base set out in the Scrubs Lane Development Framework Principles. Development capacity information for these sites was subsequently used to inform the Development Capacity Study in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. This considers the improvements in public transport provided by Old Oak Common Station, Scrubs Lane bus services and proximity to the development of Kensal Canalside, including the potential Elizabeth Line Station. Development capacity also considers the adjacent sensitive locations of Little Wormwood Scrubs, Wormwood Scrubs and residential areas.
P10/31	P10	Without a commitment about the delivery of the Hythe Road station, the densities in Scrubs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Should Hythe Road Station not be delivered, high density development would be appropriate based on public transport accessibility improvements

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Lane are unjustified and ineffective		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	offered by Old Oak Common Station, improvements to Willesden Junction Station and bus services along Scrubs Lane. Relevant policies support enhancements to public transport accessibility levels.
P10/32	P10	Support designation of Cumberland Park Factory Conservation Area	13	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.
P10/33	P10	Planning permissions along Scrubs Lane have been permitted based on the emerging policy of the Scrubs Lane Development Framework Principles Document and emerging Regulation 19 Local Plan. Draft Regulation 18 Local Plan policies have been disregarded. Objections to permissions refer to these decisions being premature.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Permissions have been determined following a plan led approach considering relevant national guidance, London Plan policies, Local Plan policies and other material considerations on a case by case basis.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Permissions do not deliver the Regulation 18 vision to deliver a sensitive edge and "a pleasant street, respectful of surrounding heritage assets, with a high quality public realm".			
P10/34	P10	Sub paragraphs of P10 are too detailed for a Local Plan. This reflect land ownerships of developers and does not provide a plan-led approach. Clusters are not justified due to lack of evidence of their locations being more active or distinctive than other locations.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/35	P10	LBHF as Highways Authority has submitted strong objections to the series of planning applications for developments in Scrubs Lane, on the grounds that these are premature until a comprehensive new road layout is delivered.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Permissions along Scrubs Lane accord with Policy P10 by providing sufficient space to enable the future delivery of high quality cycle lanes and a generous footpath. This is recommended by the Scrubs Lane Development Framework Principles document. Detailed design schemes for the cycle land and footpath will be undertaken at the appropriate time reflecting delivery of development along Scrubs Lane.
P10/36	P10	Policy P10f)ii) is not considered to be deliverable and is too detailed for a Local Plan and should be removed and left for a SPD, Area Action Plan or neighbourhood plan	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P10/37	P10	Policy for the clusters is too detailed and would be more appropriate in a site planning brief or neighbourhood plan.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P10/38	P10	Object to the proposal for a separate segregated cycleway	1	Regents Network	No change proposed. A continuous segregated cycle lane along the full length of Scrubs Lane

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		over the Grand Union Canal and consider that the proposal for it is not clear in the Local Plan			is required to support local permeability. Additional guidance will be provided with the future Old Oak North and Scrubs Lane Supplementary Planning Document in due course.
P10/39	P10	Support for Pillbox precedent but it is not very descriptive	1	Regents Network	Noted.
P10/40	P10	All parks and green spaces in Kings Cross are linear as there is little space that is 'open'.	1	Regents Network	Noted.
P10/41	P10	Local Plan should allow flexibility for taller buildings outside of cluster locations, in particular gateway locations such as 151 Scrubs Lane.	1	Remavon	No change proposed. The approach to tall buildings along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. Building heights will also be informed by national guidance, London Plan policies and Local Plan policies including SP9 and D5. This accords with the requirements of Draft New London Plan policy D8 to define locations of tall buildings.

P10C1: Harrow Lane Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C1/1	P10C1	Support principle of tall building on corner of Scrubs Lane/ Harrow Road	1	Fruition Properties	Noted.
P10C1/2	P10C1	The Harrow Road cluster can deliver a range of uses	1	Fruition Properties	No change proposed. OPDC considers the range of land uses proposed for the Harrow Cluster in Policy P10C1 to be appropriate and reflect its location, existing land uses and potential development capacity.
P10C1/3	P10C1	Retaining the Chandelier building would restrict the development potential of the cluster from a construction logistics perspective. Retention would also restrict delivery of 2-way cycle lane along Scrubs Lane. Floorspace could be reprovided within the cluster	1	Fruition Properties	No change proposed. OPDC considers the retention of the Chandelier Building supports the delivery of the P10 vision for Scrubs Lane, continuing the employment heritage of Scrubs Lane and supporting the local economy. This approach is supported by the Scrubs Lane Development Framework Principles which demonstrates the delivery of new cycle lanes are achievable with the retention of the Chandelier building. The Chandelier Building is also a Building of Local Heritage Interest, identifying it as a non-designated heritage asset and benefiting from policy D8 to secure its conservation and enhancement.
P10C1/4	P10C1	Incorrect reference to complete listing as asset of community value	1	Fruition Properties	Change proposed. Reference to the correct Asset of Community Value listing has been made in P10C1.
P10C1/5	P10C1	Community and employment aspect of this policy is crucial. Development should be	1	David Craine	Noted. London Plan policies and Local Plan policies P10, SP9, D4 and D5 provide guidance to ensure development responds to

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		sensitive to existing residential development.			existing residential areas as sensitive locations.
P10C1/6	P10C1	Harrow Road Cluster could make greater contribution to jobs and homes targets	1	Fruition Properties	<p>No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Scrubs Lane Development Framework Principles development capacity assessment.</p> <p>Additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.</p>

P10C2: Laundry Lane Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C2/1	P10C2	Green bridge linking Old Oak Gardens and Laundry Lane is not supported. Wording should be changed to a 'bridge'.	1	Old Oak Park Limited	Change proposed. To reflect recommendations of the Old Oak North Development Framework Principles the policy has been amended to support an all modes route to Old Oak North.
P10C2/2	P10C2	Policy is sound	2	A Somefun, David Craine	Noted.

P10C3: Hythe Road Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C3/1	P10C3	Policy is sound	2	A Somefun, David Craine	Noted.

P10C4: Mitre Canalside Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C4/1	P10C4	The Planning Statement in the Mitre Yard planning application did not consider the air quality of the location of the development	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The comment relates to a planning application's planning statement rather than to the Local Plan.
P10C4/2	P10C4	Improved connectivity wouldn't be achieved by delivering a route through the Mitre Wharf site as no through route exists east of the site, and no plans are in place for such a route.	1	Boropex Holdings Limited	No change proposed. Policy P10C4 does not seek to deliver a through route through Mitre Wharf to the east. References to improving connectivity seek to deliver improved and new connections to the site.
P10C4/3	P10C4	Support vision for P10C4, but the vision and P10C4(a) should include explicit reference to residential uses.	1	Boropex Holdings Limited	Change proposed. The vision for the Mitre Canalside Cluster and policy P10C4 have been amended to refer to residential uses.
P10C4/4	P10C4	Location is too sensitive with regard to impact on surrounding	1	Royal Borough of Kensington and Chelsea	No change proposed. The approach to building heights along Scrubs Lane is supported by the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		heritage assets for a tall building and high density on the eastern side of Scrubs Lane and along the canal. Tall buildings are not the only way to mark important locations/junctions and to support wayfinding. In this case, Mitre Bridge would be the important and characteristic landmark and to help wayfinding.			Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. An assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. OPDC considers that building heights are one of the potential ways to support legibility appropriate to the role and scale of Old Oak.
P10C4/5	P10C4	Policy is sound	1	A Somefun	Noted.
P10C4/6	P10C4	Support the focus on leisure, eating and drinking and communal activity close to the canal.	1	David Craine	Noted.
P10C4/7	P10C4	Mary Seacole Gardens should be enlarged and enhanced.	1	Regents Network	Noted. Policy P10C4 seeks to increase the size, quality and accessibility of Mary Seacole Gardens.

Place Policy P11: Willesden Junction

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P11/1	P11	The proposed links from Willesden Junction Station in	2	London Borough of Brent, Local resident	No Change proposed. There are two links to Willesden Junction station proposed to route

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.			north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/2	P11	Policies for Willesden Junction Station are broadly consistent with TfL's aspirations.	1	Transport for London (Group Planning)	Noted.
P11/3	P11	Any proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs. Any dedesignation would be subject to standard rail industry procedures and consultation.	1	Transport for London (Group Planning)	Noted. No change proposed. OPDC will continue to discuss with TfL on this point.
P11/4	P11	It should be assumed that bus interchange and standing facilities should be retained, though longer term solution may be found meaning bus standing is not required.	1	Transport for London (Group Planning)	Noted. OPDC has retained the bus interchange and standing facilities at Willesden Junction station. OPDC will support future work investigating longer term solutions.
P11/5	P11	Station improvements and delivery of new bridge link should be early priorities.	1	HGH Planning	Noted. OPDC will the support the earliest delivery feasible for these transport improvements.
P11/6	P11	Should include public realm improvements for pedestrians walking between Willesden	1	Victoria Hollertz	No change proposed. The figure for the Willesden Junction place policy (P11) identifies improvements to the bridge. This is

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Junction via Station Approach over bridge to Old Oak Lane			supported by the Victoria Road/ Old Oak Lane supporting study. This is included in OPDC's Infrastructure Delivery Plan.
P11/7	P11	Support the development and timely delivery of Willesden Junction.	2	London Borough of Hammersmith and Fulham, David Craine	Noted.
P11/8	P11	Policy is sound (no justification provided)	1	Friary Park Preservation Group	Noted.
P11/9	P11	Lack of clarity about improvements to Willesden Junction station	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No Change proposed. Three improvement options were developed and are outlined in the Wilesden Junction station supporting study. Further work is underway to investigate this further.
P11/10	P11	Support the views of the Harlesden Neighbourhood Forum on the Willesden Junction place	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
P11/11	P11	The proposed links from Willesden Junction Station in the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.	1	London Borough of Brent, Harlesden Neighbourhood Forum	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/12	P11	Any proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs.	1	Transport for London (Group Planning)	Change proposed. OPDC will add to the supporting text to make clear the the proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs. The depot is not shown as being deliverable within the plan period any longer.
P11/13	P11	Station improvements and delivery of new bridge link should be early priorities.	1	HGH Planning	Noted. No change proposed
P11/14	P11	should include public realm improvements for pedestrians walking to Old Oak Lane	1	Not logged	No change proposed. This is indicated within Policy P8 and P11
P11/15	P11	Support the development and timely delivery of Willesden Junction.	1	London Borough of Hammersmith and Fulham	Noted.
P11/16	P11	At Willesden Junction, the proposed new High Street should connect to the west via	1	Not logged	No Change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Station Road, rather than to the east to Harrow Road.			plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/17	P11	Directing the High Street to connect to Station Road rather than Harrow Road would bring greater benefits to Harlesden Town Centre and in providing appropriate commercial uses along the High Street link.	1	Not logged	No Change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/18	P11	Policy is sound (no justification provided)	1	Friary Park Preservation Group	Noted.
P11/19	P11	Strongly support improvement to Willesden Junction.	1	David Craine	Noted.
P11/20	P11	Support the views of the Harlesden Neighbourhood Forum on the Willesden Junction place	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P11/21	P11	Primary concern is that Harlesden will not be integrated with the development of Old Oak. The Local Plan does not go far enough in promoting improved links.	1	Harlesden Neighbourhood Forum	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/22	P11	The RLNS identifies the need to manage impacts of Old Oak on Harlesden Town Centre. The Harlesden Neighbourhood Plan has focused on improvements to Station Road and to regenerating the core of the town centre.	1	Harlesden Neighbourhood Forum	Noted. The improvements to Station Road are indicated within the place policy.
P11/23	P11	The Local Plan should revert to the principal link through to Station Road shown in the regulation 18 Local Plan with active frontages adjacent to it.	1	Harlesden Neighbourhood Forum	Change proposed. The figure has been amended to reflect updated evidence base to show Old Oak Street as a walking and cycling route connecting to Station Approach and another walking and cycling route to the east. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden.
P11/24	P11	Discrepancy between Fig 3.8, which shows the High Street connecting westwards to Station Road and Figure 4.50	1	Harlesden Neighbourhood Forum	Change proposed. The figure has been amended to reflect updated evidence base to show Old Oak Street as a walking and cycling route connecting to Station Approach and another walking and cycling route to the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					east. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden.
P11/25	P11	Policy should be that the High Street is proposed to be diverted west in front of the station to join with Station Road and this should be shown in the diagram.	1	Harlesden Neighbourhood Forum	No change proposed. Station Approach is identified as a key route in the diagram. The high street is an alternative link serving the west desire line.
P11/26	P11	Development principles for wider area of Willesden Junction should not be driven by station design. Access to Harlesden Town Centre will be key. Overstation development at the western end with active frontages and the provision of a new entrance facing onto Station Road would bring benefits to Harlesden and its community.	1	Harlesden Neighbourhood Forum	Noted. No change proposed. The Willesden Junction area is identified as a site for long term development. Development will have to take account of the technical requirements for this station. Access to Harlesden Town centre is key. Overstation development is supported in the policy.

Place Policy P12: Wormwood Scrubs

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P12/1	P12	There has been a weakening of the theme of retaining the Scrubs as a space that is more wild than tamed. Suggested text edit to the V1 to include stress "more wild than tamed" theme.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The supporting text has been amended to make reference to the need for the Scrubs to remain more wild than tamed.
P12/2	P12	The role of the Wormwood Scrubs Trust in the management of the Scrubs requires greater emphasis, and their role in permitting any future enhancement works on the Scrubs reiterated.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that Policy P12 and the supporting text provides clear and appropriate information setting out the role of the Wormwood Scrubs Charitable Trust and the need for any proposals to be agreed with the Trust and the London Borough of Hammersmith and Fulham.
P12/13	P12	Nature of what is considered appropriate ancillary facilities should be clarified, and note should be taken of the proposed café.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To provide additional clarity regarding potential essential ancillary facilities, the supporting text has been amended to suggest potential uses.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P12/14	P12	Strongly support policies protecting Scrubs as MOL, and can't envision any special circumstances which would merit harm or any loss.	14	The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P12/15	P12	New walking and cycling routes should not be introduced across the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area.</p> <p>As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.</p>
P12/16	P12	Character of the Scrubs should be retained in the face of increased	15	The Friends of Wormwood Scrubs, Scott Cawley,	Noted. Policies P12 and EU1 provide guidance to continue to protect

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		access, greater numbers of users resulting from 3 new access points, light pollution and building heights		Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Wormwood Scrubs as Metropolitan Open Land and to conserve and enhance the Scrubs in its role as a Metropolitan Park.
P12/17	P12	Communities on different sides of the Scrubs should not be connected by new routes through the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities are not able to easily make use of the open space. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>providing for the strategic open space needs of the London area.</p> <p>As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12, requiring proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.</p>
P12/18	P12	No direct link form the Station itself to the Scrubs is required. The proposed Green Bridge is supported and is the only link that is needed for anyone from the north wishing to access the Scrubs.	15	The Friends of Wormwood Scrubs, Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities in the north are not able to easily make use of the open space.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area.</p> <p>As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
P12/19	P12	An underpass connecting the station the Scrubs is not suitable. The Local Plan is unclear if such a connection is envisaged during the lifetime of the IEP depot.	14	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>No change proposed. Policy P1 sets out that development should contribute to and/or enable the delivery of new and improved walking and cycling routes to Wormwood Scrubs, including within the surrounds of Old Oak Common Station. Policy P1C1 also seeks to deliver walking and cycling routes from the station to Wormwood Scrubs Street. The Local Plan does not set out the form of these routes from, or adjacent to, the station. Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform the form of connection from the station to Wormwood Scrubs. This work will inform future versions of the Local Plan.</p> <p>Change proposed. Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the form of connection from the station to Wormwood Scrubs. This work will inform future versions of the Local Plan. To reflect this, OPDC has amended the supporting text.
P12/20	P12	Policy should clearly state that the embankment along the northern edge of the Scrubs should be retained.	14	The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>No change proposed. Policy SP8 and EU2 seek to deliver a net gain in biodiversity including measurably conserving and enhancing Sites of Importance for Nature Conservation (SINC). Wormwood Scrubs and the embankment benefit for a number of SINC designations . This guidance is referred to in Policy P12.</p> <p>In light of this guidance to conserve and enhance biodiversity assets, the roles of Wormwood Scrubs as Metropolitan Open Land and a Metropolitan Park, OPDC considers that Policy P12 provides appropriate guidance to ensure Wormwood Scrubs continues to be cherished public open space.</p>
P12/21	P12	Oppose narrative that vegetation restricts walking and cycling access. Vegetation and woodland should not be lost to allow unneeded additional access.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area.</p> <p>As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12 to agree any proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1(a) in the protection of Metropolitan Open Land.
P12/22	P12	No new entrances from Old Oak Common Lane are required. Cycle routes from Old Oak Common Lane are not supported.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by poor quality walking and cycling routes from Old Oak Common Lane. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit. As such, existing communities in the north and west are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function

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					<p>as a Metropolitan Park, providing for the strategic open space needs of the London area.</p> <p>As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.</p>
P12/23	P12	Location of proposed cycle route along Wormwood Scrubs Street is not clear - if located within Scrubs then it should be opposed.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	The Local Plan appendix confirms that all figures in the Local Plan should be treated as indicative reflecting the role of the Local Plan. Place policy figures are identified as diagrams in the introduction to the places chapter. OPDC considers that

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				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>this level of detail within the figures are appropriate to the role of the Local Plan.</p> <p>A future Old Oak North and Scrubs Lane Supplementary Planning Document (SPD) will be developed in due course. This will provide further proposed detailed guidance for the location and design of the cycle and pedestrian route along the west of Scrubs Lane. A draft of the Scrubs Lane SPD will be subject to public consultation provide opportunities to comment on and shape these detailed proposals.</p>
P12/24	P12	Additional text required to clarify legal protection of the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To provide clarity regarding the roles of stakeholders, OPDC has amended the supporting text.
P12/25	P12	Figure 4.52 does not accurately reflect the area that currently has playing pitches. Sport England would	1	Sport England	Change proposed. Figure 4.52 has been amended to reflect the existing provision of playing fields.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		object to any loss of these playing pitches.			
P12/26	P12	Support improving access to Wormwood Scrubs.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
P12/27	P12	It is appropriate that access to Wormwood Scrubs is improved and increased and that it provides a wide range of appropriate uses and functions.	1	Mayor of London	Noted.
P12/28	P12	Support for P12 vision	2	Victoria Hollertz, ArtWest	Noted.
P12/29	P12	Support the retention of Wormwood Scrubs as Metropolitan Open Land and the role of the Scrubs as a District and Metropolitan park for all.	1	London Borough of Hammersmith and Fulham	Noted.
P12/30	P12	The lack of detail about monitoring to ensure continued biodiversity makes this policy unsound	1	Friary Park Preservation Group	No change proposed. Policy EU2 provides guidance to ensure the measurable conservation and enhancement of Sites of Importance for Nature Conservation and other identified priority habitats or species.
P12/31	P12	There should be no enhancements and new access of any sort to Wormwood Scrubs.	1	Sarah Abrahart	No change proposed. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P12/32	P12	New access points to Wormwood Scrubs and facilities need to be sensitive to areas of greatest biodiversity value.	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policies SP8, EU2, P12 and P1 provide guidance to ensure new access points and facilities conserve and enhance biodiversity assets.
P12/33	P12	P12 policy vision should recognise that the Scrubs is a Metropolitan Open Space	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P12 vision identifies Wormwood Scrubs as Metropolitan Open Land.
P12/34	P12	Should protect and undertake limited enhancements to Wormwood Scrubs	13	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. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan.
P12/35	P12	Wormwood Scrubs should not be used as justification for on-site open space and it should not be used as a construction site.	13	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,	Noted. Policy EU1 seeks to deliver a minimum of 30% of the developable area outside of SIL as publicly accessible open space. This does not include Wormwood Scrubs. Wormwood Scrubs would be protected from use as a construction

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	site through the implementation of policies P12, EU1 and EU2.
P12/36	P12	Only drainage of the pitches should be considered and Wormwood Scrubs should not be impacted by drainage measures within the development area	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Any potential use of Wormwood Scrubs as part of a strategic water management role would be carried out in accordance with policies P12, EU1, EU2 and EU3 to ensure the Scrubs continue to be a cherished public open space, important ecological asset and a protected area of Metropolitan Open Land.
P12/37	P12	Support the need for proposals to be agreed by LBHF and Wormwood Scrubs Charitable Trust	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P12/38	P12	Wormwood Scrubs is not a strategic site and would benefit from neighbourhood plan guidance.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. On 12 September 2017 OPDC Board designated the Old Oak Neighbourhood Area which did not include Wormwood Scrubs. The determination was informed by a policy and factual matrix.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Determination material is available to view online: https://www.london.gov.uk/moderngovopdc/ieListDocuments.aspx?CId=378&MId=6074&Ver=4
P12/39	P12	Need local residents input into enhancements to the Scrubs. Removal of the Scrubs from the Neighbourhood Area has curtailed this.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Statement of Community Involvement sets out OPDC's commitment to deliver high quality community consultation and engagement. This would include any proposals to enhance Wormwood Scrubs and any further relevant planning guidance.
P12/40	P12	Enhancements need to be accompanied by more effective management.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy P12 provides guidance to secure resources to deliver effective management. Use of these resources will be agreed with the Wormwood Scrubs Charitable Trust and the London Borough of Hammersmith and Fulham
P12/41	P12	Playing fields on Wormwood Scrubs should be protected. Walking and	1	Sport England	Noted. Playing fields are a component element of Wormwood Scrubs. As such they benefit from policies P12,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		cycling routes should not dissect playing fields.			SP8 and EU2 to conserve and enhance publicly accessible open space. As social infrastructure, these are also protected by Policy TCC4.
P12/42	P12	Support policies stating that Wormwood Scrubs and nearby parks should be improved, provided improvements are based on a robust PPS.	1	Sport England	Noted.
P12/43	P12	Policies for addressing flooding are not justified by evidence base	1	Wormwood Scrubs Charitable Trust	No change proposed. OPDC's Integrated Water Management Strategy identifies that there is a tendency for surface water on Wormwood Scrubs which needs to be addressed as part of proposals.
P12/44	P12	Evidence should be provided for the need for any routes and enhancements to the Scrubs.	1	Wormwood Scrubs Charitable Trust	Noted. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area.</p> <p>As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12 which requires any proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 in the protection of Metropolitan Open Land.
P12/45	P12	Segregated two way cycle lane along Scrubs Lane should not encroach upon the Scrubs.	1	Wormwood Scrubs Charitable Trust	<p>The Local Plan Appendix confirms that all figures in the Local Plan should be treated as indicative reflecting the role of the Local Plan. Place policy figures are identified as diagrams in the introduction to the places chapter. Figure 4.42 (Scrubs Lane Place) shows the proposed segregated cycle lane adjacent to the eastern edge of Wormwood Scrubs. OPDC considers that this level of detail within the figures are appropriate to the role of the Local Plan.</p> <p>A future proposed Old Oak North and Scrubs Lane Supplementary Planning Document (SPD) will be developed in due course. This will provide further</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					proposed detailed guidance for the location and design of the cycle and pedestrian route along the west of Scrubs Lane. A draft of the SPD will be subject to public consultation provide opportunities to comment on and shape these detailed proposals.

Site Allocations

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SA/1	Site allocations	Site allocation 21 - 2 Portal Way The site at 2 Portal Way has a higher capacity for residential units, commercial floor space and jobs than that identified in the Development Capacity Study and Site Allocations in the Draft Local Plan. Capacities proposed are: - Circa 380 residential units; - Circa 5,000 sqm of commercial floor space; and - Provision of approximately 300 jobs on site.	1	Culinary Quarter Ltd	Change proposed. OPDC has updated the development capacity for 2 Portal Way reflecting the progression of the active planning application. Site allocations, P7 and the Development Capacity Study has been updated.
SA/2	Site allocations	Lakeside Drive site within First Central site allocation should be removed from the allocation and	1	Deloitte LLP (on behalf of Diageo)	No change proposed. OPDC's Development Capacity Study has carried out an assessment of deliverable and developable sites

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Twyford Abbey Road should be allocated.			appropriate to the role of a Local Plan in accordance with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. This identifies that development of the Lakeside Drive site, within the First Central Site Allocation is deliverable.
SA/3	Site allocations	Canal is in the wrong location on figure 4.2	1	Canal & River Trust	Change proposed. This desktop publishing error has been corrected.
SA/4	Site allocations	Support identification of Tea Crate site as a potential site, and support approach of identifying minimum home numbers, but feel assumption of 100 dwellings for 151 Scrubs Lane does not reflect development potential. Minimum capacity should be increased to 150 units. 151 Scrubs Lane is suitable for PRS development, but the low number of units identified for the site makes PRS unviable.	1	Remavon	No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Scrubs Lane Development Framework Principles development capacity assessment. The site allocation target for the site is a minimum target. Additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SA/5	Site allocations	Delivery of the suggested commercial floorspace at 151 Scrubs Lane will be challenging in the early phases of the plan period.	1	Remavon	No change proposed. OPDC considers the capacity for commercial floorspace identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Scrubs Lane Development Framework Principles development capacity assessment. Amended capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.
SA/6	Site allocations	Mitre Wharf site should be included as a site allocation as it has the potential to deliver over 100 homes.	1	Boropex Holdings Limited	Change proposed. Following the provision of updated development capacity information, Mitre Wharf will be identified as a site allocations.
SA/7	Site allocations	The plan is unsound as it does not identify Willesden Junction Station and surrounding land as a site allocation. The site should be allocated due to the urgent need to upgrade the station and surrounding sites as the key	1	London Borough of Brent	No change proposed. Site allocations within the Local Plan are used to help OPDC demonstrate its supply of land for new housing and commercial floorspace. They are not used to identify transport infrastructure. This

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		gateway to Old Oak in advance of Old Oak Common Station opening in 2026.			guidance is provided within Place Policy P11.
SA/8	Site allocations	The boundary of sites 11 and 12 in the site allocations should be amended to better reflect land ownership.	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. OPDC has amended the boundaries to better reflect land ownership of site allocations 11 and 12 in figure 4.2.
SA/9	Site allocations	The table should acknowledge that the development of Oaklands has commenced. The EMR site is capable of greater and earlier delivery of new homes and other development.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Change proposed. OPDC's Development Capacity Study has been updated to reflect the implementation of the related planning permission.
SA/10	Site allocations	The plan should acknowledge that the Cargiant site has a total capacity for a greater number of housing units and amount of commercial floorspace than that will be delivered in the plan period	1	Old Oak Park Limited	No change proposed. Housing targets within each place are expressed as minimums.
SA/11	Site allocations	Site allocations do not provide clarity on the range of building heights considered appropriate	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. Policies SP9 and Place Policies provide guidance for building height ranges based on relevant supporting evidence base studies.
SA/12	Site allocations	Site allocations should identify the scale and density to accord with NPPG paragraph 010. This lack of transparency on density and building heights renders the Local Plan unsound.	20	Nicky Guymer, Bruce Stephenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Midland Terrace Residents,	Change proposed. Paragraph 10 of the NPPF requires that "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	development in different areas." Further detail regarding densities has been provided in policy SP9 supporting text and where supported by appropriate evidence base, building height ranges have been included in place policies.
SA/13	Site allocations	Twyford Tip site should be added as a site allocation with explicit reference to the quantum of floorspace permitted under the extant planning permission.	1	Ashia Centur Limited	No change proposed. Site allocations are informed by the Development Capacity Study which has been developed in accordance with national guidance. This guidance requires the DCS to consider whether development of the site is achievable. This is essentially a judgement about the economic viability of a site and whether development on that site will be delivered within a certain time period. Based on the existing implemented permission and the delay in completion, OPDC considers that achievability of the existing implemented scheme is currently not able to be achieved.
SA/14	Site Allocations	Site allocations should include smaller sites, including sites in the proposed new cluster.		John Cox	No change proposed. The site allocations have been identified based on information set out in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>OPDC's Development Capacity Study. The thresholds are:</p> <ul style="list-style-type: none"> - Delivery of over 100 net additional housing units over the first ten years of the plan period; - Delivery of over 1000 net additional housing units during the 11 to 20 years of the plan period; - Delivery of over 10,000 sqm of commercial and/or industrial floorspace over the plan period. <p>These site allocations have been identified and robustly assessed as being deliverable or developable within the plan period in accordance with national policy requirements. As such, the site allocations are aimed at demonstrating that OPDC is allocating sufficient land which is suitable for development in their area to meet its housing and job targets. Identifying site allocations does not exclude other sites, including smaller sites, from coming forward for development over the plan period - known as windfall sites.</p>

4. Design

Introduction

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D01	Introduction	Policies should encourage and promote innovative solutions, international best practice and designs that can deliver high quality and smart design along with high density.	1	London Borough of Hammersmith and Fulham	No change proposed. Policies SP2, D1, D2, D4 and EU11 provide this guidance.
D02	Introduction	Figure 5.1: Gasholder Park, Kings Cross is not an appropriate precedent	1	Regents Network	Noted. OPDC considers that this open space to be an appropriate precedent for open spaces in Old Oak.
D03	ALL	Design policies present an effective framework to ensure buildings are well-designed, accessible and have appropriate amenity. Policies are supported	1	Association for Consultancy and Engineering (ACE)	Noted.

Policy D1: Securing High Quality Design

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D1/1	D1	Encourage developers to engage in pre-application discussions with statutory consultees.	1	Canal & River Trust	Change proposed. OPDC has made reference to engaging in pre-application discussions with other relevant statutory consultees within D1.
D1/2	D1	Planning policy should not involve itself with the appointment of appropriately	1	Old Oak Park Limited	Change proposed. This has been removed from the policy.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		qualified professional design firms by private developers. This requirement should be removed.			
D1/3	D1	Design guidelines are better secured through planning conditions. Request wording be amended to include planning conditions or, where this is not possible, section 106 agreements.	1	Old Oak Park Limited	Change proposed. OPDC has amended the supporting text to make reference to secure design guidelines as part of Section 106 agreements and / or planning conditions.
D1/4	D1	Policy is sound	14	A Somefun, 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.
D1/5	D1	Policy is unsound	1	Sarah Abrahamart	Noted. OPDC considers Policy D1 to be sound.
D1/6	D1	Showing precedents of buildings of 8-14 storeys is unrealistic given what is proposed.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. OPDC considers the precedent of Tate Modern to be an appropriate precedent for delivering high quality design within a high-density area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D1/7	D1	The OPDC Place Review Group so far has not delivered any distinguished design. OPDC's Place Review Group should be reformed and include experienced lay members	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC's Place Review Group comprises a panel of built environment experts to provide independent advice for development proposals. A Community Review Group has been established to inform the development management process. This has been referenced in policy D1.
DI/8	D1	There is a potential conflict of interest between the role of the OPDC as 'Development Corporation' and 'Planning Authority'	13	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 plan making and development management roles as the local planning authority are implemented in accordance with legislation and national guidance. These duties are carried out separately to those as OPDC as a future potential landowner.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI/9	D1	Concerns that OPDC has a lack of commitment to high quality design.	13	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Catherine Sookha, Regents Network	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.
DI/10	D1	Support D1b)v)	13	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.
DI/11	D1	The policy is not effective. Further clarity required for setting out different options and proactive community engagement. It should refer to the need for engagement with local people, via neighbourhood forums, as	14	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Change proposed. Proactive engagement is set out in OPDC's Statement of Community Involvement. This was updated in February 2017 to reflect requests by community groups to secure more effective engagement. The Community Review Group has been established to inform the development management process. This has been

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		early as possible in the design process.		Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Grand Union Alliance	referenced in D1. Policy D1 will continue to require major and strategic development proposals to undertaken proactive engagement with the community.
DI/12	D1	Figure 5.2: Tate Modern is an inappropriate precedent.	1	Regents Network	No change proposed. OPDC considers the precedent of Tate Modern to be an appropriate precedent for delivering high quality design within a high-density area.
DI/13	D1	Insufficient DM guidance to deliver Lifetime Neighbourhoods and achieve aspirations for SP2 and SP4	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the full range of Strategic Policies, Place Policies, Development Management Policies and those set out in the London Plan alongside national guidance facilitate the delivery of Lifetime Neighbourhoods within the OPDC area. Specifically, these are considered to deliver the three principles for Lifetime Neighbourhoods: 1. can get around – neighbourhoods which are well-connected and walkable. 2. as far as possible, can have a choice of homes, accessible. 3. belong to a cohesive community which fosters diversity, social interaction and social capital.
DI/14	D1	Further consideration of how high quality design is measured is required.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI/15	D1	Change policy title to "Securing High Quality Design and Lifetime Neighbourhoods". Refer to Lifetime Neighbourhoods within the opening sentence of D1 and through the policy including: - community ownership and security - adequate community orientated facilities and meeting places - adaptable and imaginative buildings that are designed to last for 150 years neighbourhoods that are inclusive, - human and beautiful, providing for whole communities with spiritual makers, facilitators and educators at their heart,	13	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. Lifetime Neighbourhoods are referenced in Policy SP2 and D3. No change is proposed to the policy wording. Supporting community ownership is set out in Policy DI3, delivering community facilities is set out in policies SP4, TCC4 and place policies, delivering high quality resilient buildings is set out in policies SP2 and SP9.
DI/16	D1	Specify what 'relevant and appropriate' means in D1(a)	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. "Where relevant and appropriate" enables OPDC to consider how to respond to the unique aspects of individual

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	proposals in determining planning applications.
DI/17	D1	D1(b)iv is not consistent with NPPF para 57 due to it being limited to major and strategic schemes.	13	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 D1(a) complements D1(b)(iv) by setting out requirements for all development proposals. This ensures Policy D1 as a whole accords with NPPF paragraph 57.

Policy D2: Public Realm

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D2/1	D2	Policy is too restrictive on requirements for unrestricted public access. There may be instances where open space within a development scheme can also form part of the	1	Castlepride Limited	No change proposed. OPDC considers Policy D2 to enable sufficient provision for publicly assessable private realm to be closed for management and safety purposes while ensuring provision of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		public realm but it is appropriate to limit public access.			open space is optimised across the OPDC area. This is in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7.
D2/2	D2	Policy should refer to Healthy Streets approach.	1	Transport for London (Group Planning)	Change proposed. OPDC considers references to Healthy Streets would be appropriate to help deliver the Mayor's aspirations for health and well being. Policy D2 has been amended accordingly.
D2/3	D2	Public access to private realm is dependent on phasing and should be determined through a S106 agreement. This part of the policy should be removed	1	Old Oak Park Limited	No change proposed. OPDC considers Policy D2 to enable sufficient provision for publicly assessable private realm to be closed for management and safety purposes while ensuring provision of open space is optimised across the OPDC area. This is in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7.
D2/4	D2	Requirements to provide details of cleaning and maintenance is too detailed for outline planning applications where design details may not have been finalised. This part of the policy should be removed.	1	Old Oak Park Limited	Change proposed. OPDC considers it appropriate to reflect the type of planning application in requirements for management and maintenance strategies. The supporting text has been amended accordingly.
D2/5	D2	Policy is unsound	1	Sarah Abrahart	No change proposed OPDC considers D2 is sound.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D2/6	D2	Support for Policy	13	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.
D2/7	D2	Canary Wharf, the Olympic Park and Royal Borough of Kensington and Chelsea also provide good precedents for public realm. OPDC should consider prepare guidance on the choice of materials and standard designs for hard landscaping.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is currently considering whether to develop public realm supplementary guidance following adoption of the Local Plan.
D2/8	D2	Need to be clearer about the need for public realm to be genuinely public.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D2 provides guidance ensuring public access to privately owned public realm in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7. The ownership of open space will be considered on a case by case basis in discussion with

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					relevant stakeholders including boroughs.
D2/9	D2	Figure 5.3 Elephant and Castle is an appropriate precedent.	1	Regents Network	Noted.
D2/10	D2	North Acton has poor quality public realm. This sets a poor precedent for the rest of the OPDC area and does not accord with NPPF para 58.	13	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. Policies SP2, SP9, D2 and P7 provide guidance to delivery new high quality public realm and improve the existing public realm of North Acton.
D2/11	D2	Developer led public realm needs coordination by OPDC	13	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. Policy D2 provides policy to ensure public realm across different land ownerships is coordinated.
D2/12	D2	Lunchtime spaces needed. Canal public realm needs to be improved.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Noted. Policy P3, P4, P5 and P6 provide policy for delivering new and improved public realm in Park Royal and along the Grand Union Canal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D2/13	D2	Suggested public realm activation could include a range of activities for all ages.	13	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. Policy D3 provides policy for delivering accessible and inclusive public realm with Policy D9 also providing guidance for delivering play and recreation for all ages.
D2/14	D2	Mode separation is required for all transport types.	13	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 T1 provides guidance for movement functions of streets and the public realm. Policy T1 ensures all new streets are built and designed in accordance with all relevant standards, appropriate to local characteristics and demands. Policies T2 and T3 provide guidance for delivering safe and secure walking and cycling routes.
D2/15	D2	Permeability and legibility need to be balanced with street enclosure vs. legibility	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Policies D2, D4, D5, D6 and SP9 provide a policy approach that provides the tools to balance local character,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	amenity of the public realm, built form and legibility.
D2/16	D2	A balance of roles of public realm for local services vs destination areas is required.	13	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. Policies D2, TCC8 and Place Policies provide guidance to deliver multi-functional public realm including a range of roles.
D2/17	D2	Landscaping strategy is required	13	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. OPDC is currently considering whether to develop public realm supplementary guidance following adoption of the Local Plan. This may include specific landscaping guidance.
D2/18	D2	Connections to surrounding areas is key	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted. Policies SP7 and T1 provide policies for delivering connections to surrounding areas.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

Policy D3: Accessible and Inclusive Design

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D3/1	D3	Figure 5.4: Peter's Hill is not an appropriate precedent.	1	Regents Network	No change proposed. OPDC considers Peter's Hill to be an appropriate precedent.
D3/2	D3	Refer to different ages of the community and ensure development is designed to enable activity for the elderly.	14	Grand Union Alliance, Bini Ghebreyes, 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. Age is one of the elements required to be considered in delivering accessible and inclusive design within the Mayor's Accessible London SPG. Policy D3 seeks to deliver development that is compliant with the latest guidance on accessible and inclusive design as an integral part of their design. As such considering age is addressed in Policy D3.
D3/3	D3	Refer to income levels.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Policy D3 refers to all users which encompasses different income levels.

				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D3/4	D3	Refer to changing needs	13	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. OPDC considers it appropriate to refer to the changing needs of people to delivery an accessible and inclusive environment. Policy D3 has been amended accordingly.

Policy D4: Well-Designed Buildings

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D4/1	D4	Welcome any changes to the plan that will improve fire safety for the future residents	1	Hammersmith and Fulham Council	Change proposed. OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect draft London Plan policy and Building Regulations requirements.
D4/2	D4	Principles of circular economy should also be included in D4: Well Design Buildings.	1	LWARB	No change proposed. Policy EU7 provides guidance for delivering the principles of the Circular Economy within development.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D4/3	D4	Add another requirement to deliver urban greening onto suitable surfaces, including vertical greening.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU2 provides guidance for delivering urban greening within development.
D4/4	D4	Policy is unsound, unjustified and unclear	3	Arnaud Demas, Sarah Abraham	No change proposed. OPDC considers D4 is sound.
D4/5	D4	Plan will result in overdevelopment.	1	Ron Thorp	No change proposed. Local Plan policies, London Plan policies, national guidance and other material considerations will be used to deliver a high quality high density environment.
D4/6	D4	Support policy, but have concerns regarding how designs will be assessed.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.
D4/7	D4	Generally, support D4 but towers cannot respond positively to character or make a positive contribution to the townscape.	1	Regents Network	No change proposed. Local Plan policies SP9, D2, D4, D5, current and draft London Plan policies provide guidance for ensuring tall buildings respond positively to character and make a positive contribution to townscape. OPDC considers that tall buildings, if well designed and in the right

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					location, can contribute to local character and positively contribute to the skyline.
D4/8	D4	Figure 5.5: Trafalgar Place, Elephant and Castle is a better precedent but it lacks 'homeliness'	1	Regents Network	Noted. OPDC considers Trafalgar Place is an appropriate precedent.
D4/9	D4	Policy should reflect NPPF para 66 requiring applicants to evolve designs with input from the community.	13	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 D1 provides guidance for ensuring designs respond to views of the community in accordance with OPDC's Statement of Community Involvement.
D4/10	D4	Play space should not be on roofs	13	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 D9 requires child play space to be delivered in accordance with the latest OPDC and GLA guidance. The Mayor of London's Play and Recreation SPG states that "In new developments, the use of roofs and terraces may provide an alternative to ground floor open space where they are safe, large enough, attractive and suitable for children to play, careful consideration should be given to these options, including the need for supervision and any restrictions that this might put on the use of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the facilities" and "the use of roofs, terraces and indoor space can be an alternative to ground floor open space but issues about safety and supervision should be given careful consideration". As such, play space at roof level could be appropriate subject to meeting requirements set out in the Local Plan, London Plan and the Play and Recreation SPG.
D4/11	D4	Do not support use of excessive glass in the developments	1	Regents Network	Noted. Policy D6 provides guidance for considering the impact of light on amenity of building users and the public realm.

Policy D5: Tall Buildings

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D5/1	D5	Generally, support approach to tall buildings, but suggest additional sites not currently identified, including 19 Abbey Road, which would be suitable for tall buildings.	1	T.A.S.B. Investments Limited	No change proposed. The Local Plan provides guidance for the location of tall buildings in accordance with Draft New London Plan policy D8. This coordinates information from a range of supporting studies and a review or precedent developments to define locations where tall buildings are an appropriate form of development in principle.
D5/2	D5	Use of term "outstanding" for measuring tall building design is too subjective.	1	Castlepride Limited	Noted. This element of the policy has been removed to avoid repetition of Draft New London Plan Policy D8.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D5/3	D5	Clarification sought for statement setting out how development will deliver significant benefits in accordance with paragraph 5.41.	1	Old Oak Park Limited	No change proposed. Policy D5 and policies supporting text identify potential significant benefits. Securing benefits and defining their delivery will be carried out on a site by site basis.
D5/4	D5	Too many tall buildings are proposed.	1	Ron Thorp	No change proposed. The Local Plan provides guidance for a range of building heights based on supporting evidence studies. Policies SP2, SP9, D4, D5, D6 and Place Policies provide guidance for delivering high quality high density development including tall buildings.
D5/5	D5	Heights are driven by untested London Plan development capacities. This is demonstrated by tall buildings planned along Scrubs Lane. Rationale is not justified.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the homes and jobs targets for each place are justified. These are based on development capacity information set out in OPDC's Development Capacity Study. This has been developed in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. The Development Capacity Study is based on development capacity information set out in the Old Oak North Development Framework Principles the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					provided specific information for development capacity for the Development Capacity Study. Justification for tall buildings is set out in the Scrubs Lane Development Framework Principles and OPDC's Tall Building Statement.
D5/6	D5	Tall buildings have no place in West London and will blight Wormwood Scrubs.	1	Sarah Abraham	No change proposed. High quality tall buildings at appropriate locations will be a component element of the built character and environment of the OPDC area. This is set out in OPDC's Tall Building Statement. The Draft New London Plan Policy D8 also recognises that Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. Policy P12 sets out guidance for managing impacts on Wormwood Scrubs.
D5/7	D5	OPDC needs to reconsider its approach to tall buildings in light of the Grenfell Tower tragedy including considering fire risk and associated costs.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Change proposed. OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect draft London Plan policy D11 and Building Regulations requirements. This will

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	be applied to all buildings including tall buildings.
D5/8	D5	High rise blocks seem synonymous with luxury development, might also be left empty for much of the time. This does not support lifetime neighbourhoods	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies SP2, SP4 provide guidance for development to contribute to delivering Lifetime Neighbourhoods. Policy H1 sets out OPDC's aspirations to work with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London.
D5/9	D5	High rise development makes it more challenging to deliver affordable housing	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC recognises that delivering affordable housing in tall buildings can be challenging and this is reflected in the assessments of different densities within OPDC's Affordable Housing Viability Assessment supporting study. However, OPDC also recognises that affordable housing can be delivered across a range of building heights subject to addressing relevant challenges.
D5/10	D5	OPDC should provide evidence for consideration of	13	Grand Union Alliance, Wells House Road	No change proposed. Policy D5 has been amended to meet the requirements of the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		costs and challenges to deliver tall buildings		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	Draft New London Plan in delivering planning policies for defining the height and location of tall buildings appropriate to the role of a Local Plan. This process is set out in OPDC's Tall Buildings Statement. Evidence for the consideration of costs and challenges to the deliver tall buildings/height densities is set out in OPDC's Whole Plan Viability Study. This tests the ability of a range of development types throughout the OPDC area to viably meet the policy requirements of the Local Plan in accordance with national and best practice guidance. This identifies that viability looks less favourable in the higher density schemes at lower values and higher benchmark land values. However, it goes on to highlight that such schemes will most likely only come forward where the values achievable are able to meet the costs of delivering tall/high density schemes. Therefore, it would be reasonable to expect such schemes to achieve above the mid sales values and more likely the higher sales values.
D5/11	D5	OPDC should look at international case studies to examine good and bad examples of optimising	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Case studies have been explored in OPDC's Precedents Study and Development Capacity Study. In some instances, high densities can be achieved without tall buildings, but in others, OPDC

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		density without having to build high-rise buildings		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	considers it appropriate for development to deliver tall buildings.
D5/12	D5	Energy demand and low carbon development is challenging at high densities	13	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. The Draft New London Plan continues to provide guidance for delivering low carbon development. OPDC will be publishing supplementary guidance to define how this can be achieved at in tall buildings and high densities.
D5/13	D5	Should provide alternatives to delivering tall buildings as set out in the Environmental Standards Study	13	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. Defining alternatives to tall buildings would not be in general conformity with the Draft New London Plan. Change proposed. Policy D5 has been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. The information supporting this definition is set out in

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>OPDC's Tall Building Statement.</p> <p>Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.</p>
D5/14	D5	Policy should align with London Plan Policy 7.7 including requiring links to surrounding areas.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the policy is in general conformity with London Plan policy 7.7 and aligns with draft London Plan Policy D8. Policies SP7 and T1 provide guidance to ensure the OPDC area is well connected to surrounding areas.
D5/15	D5	The Local Plan should set out a presumption that tall buildings will not be accepted. It should define that any building taller than	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Change proposed. Policies SP9 and D5 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		27 metres is a tall building. There should be an automatic trigger for special assessment.		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Any building above this height would be subject to the policies set out in Draft New London Plan Policy D8 and Local Plan Policy D5.</p> <p>Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9.</p> <p>This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.</p>
D5/16	D5	A Parliamentary enquiry in 2002 found that tall buildings are not essential to the urban renaissance.	13	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. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D5/17	D5	The Local Plan needs to consider historic context in the location of tall buildings.	13	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. Policies SP9, D4, D5 and D8 provide guidance for ensuring tall buildings conserve and enhance the historic environment. Draft London Plan policy D8 also requires proposals for tall buildings to take account of, and avoid harm to, the significance of London's heritage assets.
D5/18	D5	The Local Plan needs to consider 'Tall Buildings' Historic England guidance note.	13	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>Change proposed. Policies SP9 and D5 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Any building above this height would be subject to the policies set out in Draft New London Plan Policy D8 and Local Plan Policy D5.</p> <p>Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant</p>

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.
D5/19	D5	The Local Plan should give careful consideration to how a tall building meets the ground.	13	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. Policies D2, D4 and D5 provide guidance for the relationship between tall buildings and the public realm. Draft New London Plan policy D8 also provides guidance for considering the base of tall buildings and relationship with the street.
D5/20	D5	Tall buildings must be assessed on a number of key factors and meet related requirements	13	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. Alongside Policies SP2, SP9, D2 and D4, Policy D5 sets out these criteria. The London Plan Policy 7.7 and draft London Plan Policy D8 also provide guidance for assessing proposals for tall buildings.
D5/21	D5	D5c)ii) and D5c)iii) are not justified. The assertion that tall buildings can aid legibility	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association,	No change proposed. The use of building heights to support local legibility is recognised in London Plan paragraph 7.27 and draft London Plan Policy D8.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		and provide identity to areas is not supported.		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	
D5/22	D5	Tall buildings will create a separation between Old Oak and surrounding areas.	13	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. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. Local Plan policies SP7 and T1 provide guidance to ensure existing surrounding areas are well connected to Old Oak.

Policy D6: Amenity

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D6/1	D6	Policy D6 should be more flexible regarding daylight and sunlight levels when increasing density and for open spaces.	1	Castlepride Limited	No change proposed. OPDC considers Policy D6 provides sufficient flexibility to secure appropriate levels of daylight and sunlight.
D6/2	D6	Broad support for policy D6	13	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 D7: Key Views

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D7/1	D7	Support for policy D7	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D7/2	D7	Policy is unsound	1	Sarah Abrahart	No change proposed. No reason has been given as to why the policy is unsound.
D7/3	D7	Clarity required for whether views are protected from within the OPDC area or surrounding areas	1	Scott Cawley	Change proposed. The supporting text has been amended to provide clarity that the policy applies to development within the OPDC area.
D7/4	D7	Additional key view from the Round Pond in Kensington Gardens is proposed.	1	Royal Borough of Kensington and Chelsea	No change proposed. OPDC does not consider it appropriate to identify Kensington Gardens Round Pond as a viewing point as development is highly unlikely to be viewable from this location.
D7/5	D7	Clarification sought about policy D7 and relationship to other mechanisms managing views. Suggest that a refined policy approach is taken to managing different types of view. Object to inclusion of kinetic views from railway lines and those outside of LVMF views or related to designated heritage assets.	1	Old Oak Park Limited	Change proposed. OPDC considers it appropriate to provide further clarification for the role and assessment of kinetic views.
D7/6	D7	Too much detail is required about effects on key views. This is better determined in an EIA scoping exercise	1	Old Oak Park Limited	No change proposed. OPDC considers that supporting information aligns with standard practice for Townscape/Visual Impact

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Assessments and should be included to inform EIA scoping considerations.

Policy D8: Heritage

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D8/1	D8	Support approach to working with stakeholders to address heritage assets at risk	1	Historic England	Noted.
D8/2	D8	Suggest completion of outstanding conservation area appraisals, in particular for Cumberland Park Factory and St Mary's Cemetery.	1	Historic England	Noted. OPDC is progressing the development new conservation area designations and refreshing existing conservation areas appraisals and management guidelines.
D8/3	D8	Support development of a Local List and / or other non-designated heritage assets	14	Historic England, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC has consulted on local heritage listings, including the Local List.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D8/4	D8	D8 should provide policy for how designated heritage assets will be considered rather than defer to the NPPF and national guidance. This will ensure accordance with NPPF paragraphs 9, 12 and 126.	1	Historic England	Change proposed. The policy has been amended to include policy guidance for designated heritage assets.
D8/5	D8	D8 needs to clarify whether it relates to scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, or archaeology which is neither. If the latter the policy reference is fine but if not the policy is the wrong test. You may wish to qualify Part (d) as follows: "Where harm can be fully justified, where relevant, the Council will require archaeological excavation and/or recording as appropriate, an Archaeological Impact	1	Historic England	Change proposed. The OPDC area does not have any scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments. As such, OPDC considers that Policy D8 accords with National Planning Policy Framework paragraph 123 and National Planning Policy Guidance Paragraph: 040 Reference ID: 18a-040-20140306. To provide clarity and consistency with national guidance, the supporting text has been amended accordingly.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Assessment and publication of the results."			
D8/6	D8	Policy could refer to the statutory test for development proposals within conservation areas.	1	Historic England	No change proposed. OPDC does not consider it necessary to repeat legislation and national guidance for managing conservation areas.
D8/7	D8	Policy should refer to the role of Historic Environment Record, Local List, Conservation Area Appraisals and Management Plans in shaping future change within the plan area.	1	Historic England	Change proposed. The supporting text has been amended to make reference to the use of heritage tools in shaping the future of an area.
D8/8	D8	Policy is unsound	1	Sarah Abraham	No change proposed. No reason has been given as to why the policy is unsound.
D8/9	D8	Paragraph 5.65 states a commitment in to work with RBKC regarding heritage assets within the borough that are on the Heritage at Risk Register, which is welcomed.	1	Royal Borough of Kensington and Chelsea	Noted.
D8/10	D8	There are several important heritage buildings in the OPDC area	1	Hammersmith and Fulham Historic Buildings Group	Noted.
D8/11	D8	Should commemorate the heritage of the area through street and building names	1	Hammersmith and Fulham Historic Buildings Group	Noted. This is not a planning policy issue. Street names and building names are agreed by the local authority but OPDC will work positively with the relevant local authority to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					try to ensure that heritage is referenced through building and street names.
D8/12	D8	Support Hammersmith and Fulham Historic Buildings Group's analysis of heritage assets and Old Oak Outline Historic Area Assessment	13	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.
D8/13	D8	Support heritage led development, where appropriate.	13	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.
D8/14	D8	The area should build on the existing cultural heritage and industrial legacy	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. Policy D8 through OPDC's Heritage Themes provide this guidance.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D8/15	D8	Figure 5.8: German Gymnasium, Kings Cross is not an appropriate precedent.	1	Regents Network	No change proposed. OPDC considers the German Gymnasium to be an appropriate precedent.
D8/16	D8	Figure 5.9: The Eagle, Old Street is not an appropriate precedent.	1	Regents Network	No change proposed. OPDC considers the Eagle to be an appropriate precedent.
D8/17	D8	The canal is a considerable heritage item which is not recognised in the Local Plan	1	Regents Network	No change proposed. OPDC considers the Grand Union Canal is appropriately recognised as a key asset throughout the Local Plan.
D8/18	D8	Numerous suggestions for features along the canal that should be considered as being of interest for heritage	1	Regents Network	Noted. OPDC will use this information to inform the development of the Grand Union Canal Conservation Area Appraisal and Management Guidelines.
D8/19	D8	Support for depicting assets on policies map	13	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	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
D8/20	D8	Welcome identification of the Canal as of heritage theme, but would suggest further wording to require relationship between themes is considered in applications.	1	Canal & River Trust	Change proposed. OPDC considers it appropriate to deliver a holistic approach in conserving and enhancing OPDC's heritage themes. Policy D8 has been amended accordingly.
D8/21	D8	Non-designated heritage assets should be maintained as a live register and not designated within the Local Plan.	1	London Borough of Ealing	Noted. OPDC has separately consulted on local heritage listings, including the Local List.
D8/22	D8	The Castle pub does not meet the criteria to be locally listed as set out by Historic England and Ealing Council. The emphasis of draft policies TCC7 and P7C1 should be reworded accordingly.	1	Citrus Group and Fuller Smith & Turner	No change proposed OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designated as a non-designated heritage asset on OPDC's Local List. This is based on the recognition that it has historic, townscape, architectural and social significance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form.
D8/23	D8	Clarity is required for:	1	Old Oak Park Limited	No change proposed. OPDC considers the policy and supporting text to be sufficiently

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		<p>How promoting heritage assets relates to NPPF's requirement to sustain and enhance heritage assets.</p> <p>Sequential approach for managing non-designated assets. Table 5.3 relating to non-designated assets goes beyond NPPF requirements to taken into account non-designated assets' significance.</p> <p>Lack of guidance for designated assets.</p>			<p>clear in defining out promoting and enhancing the significance of heritage assets can include their reuse.</p> <p>No change proposed. OPDC considers the approach to managing non-designated heritage assets accords with NPPF paragraph 135 and to support the provision of a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.</p> <p>Change proposed. OPDC considers it appropriate to provide policy that reflects NPPF guidance to conserve and enhance designated heritage assets. Policy D8 has been amended accordingly.</p>
D8/24	D8	Additional detail should be added to the policy with regard to conservation areas.	1	London Borough of Hammersmith and Fulham	Change proposed. Additional information for managing the demolition of buildings in conservation areas has been added to supporting text to policy D8.
D8/25	D8	Policy should provide clarity regarding securing planning contributions to conserve and enhance heritage assets	1	Historic England	Change proposed. The supporting text has been amended to make reference to securing planning obligations to conserve and enhance heritage assets.

Policy D9: Play Space

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D9/1	D9	Support requirement for development to provide or contribute to play space.	1	Sport England	Noted.
D9/2	D9	Not all dedicated play space for 0 to 5s should be publicly accessible within small open spaces or pocket parks. Change to "where appropriate"	1	Old Oak Park Limited	No change proposed. OPDC considers that seeking to deliver dedicate play space in publicly accessible open space will support maximising abilities to play in a high density environment. OPDC also recognises that not all sites will be able to contribute to the delivery of play space in publicly accessible open space. This is particularly relevant for early development sites and those outside of Old Oak North and South. D9 refers to delivering these spaces "as a priority" to provide an appropriate level of flexibility. Draft New London Plan policy S4 also seeks to deliver play provision that can be accessed form the street and forms an integral part of the surrounding neighbourhoods.
D9/3	D9	Target for 4 hours sunlight on 50% of playspace on 21 March will be challenging given the densities required to meet the housing targets	2	Old Oak Park Limited, Castlepride Limited	Change proposed. Although OPDC considers that delivering a minimum amount of 4 hours of solar exposure on 50% of dedicated child play space to be critical in delivering well-used play space, supporting text to the policy has been amended to reflect that this may be challenging in a high density environment.
D9/4	D9	The focus on the provision of play space for 0-5 year olds	1	London Borough of Hammersmith and Fulham	No change proposed. Policy D9 does provide policy for over 5s, but the GLA

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		is welcomed but more development is required for the planning for provision for play for 6 to 18 year olds. As well as designated play spaces the environment needs to be designed to enable street play close to where children live and as schools are modified or built.			provides more detailed guidance on play in the London Plan and SPG, which has not been repeated here.
D9/5	D9	Support provision of play space, and this is particularly important for teenagers / older children.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted
D9/6	D9	Air quality policy EU4 should be cross referenced with this policy. Question use of where relevant and appropriate in relation to delivering this policy.	13	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,	Change proposed. The text has been amended to cross-reference Policy EU4.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D9/7	D9	Play facilities should be provided for all ages and linked to SP8 and D2	13	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 D9 requires development to contribute to maximising opportunities for play for all ages. The Policy links section makes reference to all design policies and Strategic Policy SP8.
D9/8	D9	Permitted play space currently does not meet Local Plan requirements. Play space should not be roofs.	13	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 Mayor of London's Play and Recreation SPG states: "In new developments, the use of roofs and terraces may provide an alternative to ground floor open space where they are safe, large enough, attractive and suitable for children to play, careful consideration should be given to these options, including the need for supervision and any restrictions that this might put on the use of the facilities" and "The use of roofs, terraces and indoor space can be an alternative to ground floor open space but issues about safety and supervision should be given careful consideration". OPDC considers the provision of play space above ground floor

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					is appropriate subject to meeting this guidance and that set out in D9. Schemes granted planning permission by OPDC planning committee meet the requirements of the Mayor of London's Play and Recreation SPG and D9.
D9/10	D9	Development at Old Oak should provide ample child play space for existing and new communities to combat rising childhood obesity levels.	1	Bini Ghebreyes	Noted. The amount of open space to meet need will be delivered in accordance with the latest OPDC and GLA guidance. Currently this is informed by GLA's Population Yield Calculator and Play and Recreation SPG.
D9/11	D9	Active Design should be clearly referenced across relevant Design policies.	1	Sport England	Change proposed. OPDC has amended the text to make reference to encouraging activity to be beneficial to the health and well-being of local people.

6: Environment and Utilities

Policy EU1: Open Space

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU1/1	EU1	MOL should be offered stronger protection in the policy and resupplying MOL elsewhere is not sufficient if MOL is lost. This policy does not accord with London Plan para 7.56	1	Wormwood Scrubs Charitable Trust	No change proposed. Metropolitan Open Land (MOL) benefits from the same national guidance as Green Belt. OPDC considers that policy EU1 accords with the National Planning Policy Framework paragraph 88. Strong protection to Wormwood Scrubs as MOL is also set out in Policy P12.
EU1/2	EU1	Wording of Policy EU1 should be amended to justify the loss of underutilised open space.	1	Diageo	No change proposed. OPDC does not agree that underutilised open space should be lost. Currently there is a lack of open space across the area and a need for additional provision. Where open space is poorly utilised OPDC will seek to improve utilisation by securing enhancements to the open space and securing improved access.
EU1/3	EU1	Concern that the policy is too prescriptive and could undermine opportunities to deliver open space that may not fulfil the criteria but could be beneficial	1	Castlepride Ltd	No change proposed. OPDC consider that the criteria are reasonably broad and flexible whilst ensuring that sufficient green space is provided which will fulfil the functional requirements of green infrastructure.
EU1/4	EU1	The separation of MOL and other areas of open space insinuates weaker protection for non MOL open spaces.	1	Sport England	No change proposed. MOL has special status in planning and OPDC therefore believes that it is important to highlight this. However, OPDC also recognises the importance of all open space and therefore

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					has policies to protect green space in SP8 and EU1 and to expand the provision of spaces for recreation, sport, amenity and ecology.
EU1/5	EU1	Policy a) in EU1 which states development in WWS will only be permitted in very special circumstances is inconsistent with other policies in the local plan, e.g.: P12c) which refers to the enhancement of Wormwood Scrubs by providing play space and improving functionality and accessibility in 3.88	1	Old Oak Park Ltd	No change proposed. OPDC does not consider that policy EU1, which provides the strongest protection for MOL and conforms with the London Plan, conflicts with the enhancement of Wormwood Scrubs. The two policies are not mutually exclusive.
EU1/6	EU1	Requirement for 30% of developable area as public open space is excessive given the proximity to Wormwood Scrubs	1	Old Oak Park Ltd	No change proposed. OPDC does not consider 30% open land to be excessive. The evidence collected suggests that 30%, which equates to 4.1m2 per person across Old Oak is modest. This has been benchmarked against other large-scale regeneration projects in London in order to derive an appropriate target. By comparison, the average across the LBHF is 13 m2 per person. Access to Wormwood Scrubs is currently constrained. Evidence collected by the GLA suggests that providing open and accessible space within 400ms of homes, close to schools and along safe routes significantly increases the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					amount of time people spend in parks, helps to improve healthy outcomes and can contribute to better air quality, SuDS, and quality of place.
EU1/7	EU1	Objection to requiring payments for residents and workers separately as they would use the same open space but at different times	1	Old Oak Park Ltd	No change proposed. The overall target is to ensure that 30% of the area is open green space. To achieve this, residential and non-residential developments will be required to make a contribution to open space where this target cannot be achieved on-site. The contribution will be calculated based on the population yield of the development. Some developments will be exclusively residential, some will be non-residential and others will include a mix of uses. OPDC consider that the fairest way to determine how much space should be delivered or what the contribution should be, is to share the contribution across both residential and commercial development but to reflect the higher importance residents place on provision of accessible open space.
EU1/8	EU1	Support the delivery of a minimum of 30% of publicly accessible open space as long as this does not include open space being provided to make up for losses elsewhere in the	1	LBHF	No change proposed. The target is for a total of 30% of the area to be public open space. Currently there is a significant shortage of public open space and re-provision will not in itself achieve the target.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		OPDC area. This should be clearly identified in the AMR.			
EU1/9	EU1	Information needed on how contributions for open space will be calculated and what happens if open space cannot be delivered off site.	1	LBHF	No change proposed. Further details on calculations will be included in OPDC's Planning Obligations SPD. There are a significant number of public open spaces around and within the OPDC area in need of enhancement and OPDC is therefore contented that there will be the ability to utilise off-site contributions.
EU1/10	EU1	Welcome part d) of policy	1	LBHF	Noted.
EU1/11	EU1	there is a chronic lack of green space	1	Local resident	No change proposed. OPDC's policies seek to increase green space provision across policies SP8, EU1 and EU2.
EU1/12	EU1	lack of monitoring details	1	Martin Cain, Friary Park Preservation Group	No change proposed. The approach to monitoring is addressed in OPDC's key performance indicators.
EU1/13	EU1	Policy unsound - no justification	1	Sarah Abraham, Local Resident	No change proposed. OPDC considers that the policy is sound.
EU1/14	EU1	Need a variety of open space provision and creation of a sense of ownership	13	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. The Local Plan supports the delivery of a range of open spaces. OPDC will work with developers to encourage a sense of local ownership and to ensure that space is accessible to all.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU1/15	EU1	Broadly support EU1 policy	13	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.
EU1/16	EU1	Should reference that Wormwood Scrubs MOL derives its protection from an Act but that ownership and management are through LBHF	13	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. Reference to the need for the WSCT and LBHF to agree any proposals is made in Policy P12
EU1/17	EU1	Question whether Eu1d) will be effective as concerned that private open space intended for public access cannot be appropriately protected through conditions.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Public access to private realm can be controlled through S106. Controls in respect of this are set out in Policy D2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU1/18	EU1	Not an effective policy as it fails to recognise different types of green space	13	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 wide range of open space provision has been addressed in the Local Plan. Part d) of the policy requires open space to provide for a variety of functions, including incorporating biodiversity and urban greening. In addition, developers will be required to conform with London Plan provision for play areas and other amenity. Policy EU2 also requires development to be biodiversity positive.
EU1/19	EU1	Support the target but warn that 30% public open space could result in tall buildings impacting on surrounding areas	13	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. Proposals for tall buildings would need to be assessed against relevant planning policy, including policies in the local plan, London Plan and against other material planning considerations.
EU1/20	EU1	OPDC has not notified or supported communities establishing Local Green Spaces	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association,	No change proposed. This is dealt with in policy DI3 which supports community build, ownership and management arrangements. OPDC will seek to work with local

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	communities to identify and establish local open spaces where viable.
EU1/21	EU1	Concern over who provides publicly accessible open space and how access is guaranteed in the long run if it is in private hands. Also issue of definition of publicly accessible open space and public open space.	13	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. The wording has been standardised through the Local Plan to 'publicly accessible open space'.
EU1/22	EU1	Need provision of public open space in Park Royal for workforce	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC recognises the need for public open space in Park Royal and the place policies have identified where these should be delivered. It is not considered appropriate to secure 30% public open space in SIL, where schemes are likely to be industrial led and compromise public open space quality and function.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU1/23	EU1	Accessible greenspace suitable for children from Wells House Road should be provided as part of new development.	4	Wells House Road Residents Association, Catherine Sookha, Joanna Betts, Ralph Scully	No change proposed. The Local Plan covers provision of publicly accessible open space throughout the area and will work to ensure that adequate publicly accessible open space is provided.
EU1/24	EU1	The second statement in bullet point a) is not considered to be in accordance with national or London Plan policy on MOL. Bullet point (b) is also unacceptable. Currently there is scope for developers to comply with the policy but cause undesirable impacts in terms of access to open space. Para 6.14 should not allow developers to obviate their responsibilities to contribute to the overall quota of Open Space.	14	LBHF, 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. Access has been added to the policy. OPDC considers that the policy complies with the NPPF and is in general conformity with the London Plan and NPPF. Paragraph 6.14 does not allow developers to obviate their responsibility but rather recognises and makes allowances for the fact that on some sites there is insufficient land or the land that is available is in a location that will not make a valuable contribution to the overall provision of green space.
EU1/25	EU1	Query about whether the list of requirements in d) is required of every private and communal open space	2	Old Oak Park Ltd, Castlepride Ltd	Change proposed. The wording has been amended to recognise that it is a number of the requirements, not necessarily all.
EU1/26	EU1	Policy EU1 should recognise the function of open space in providing sport and recreation.	1	Sport England	Change proposed. This has been added to the policy.
EU1/27	EU1	Role of sport and recreation in open spaces has not been given enough prominence and	1	Sport England	Change proposed. The role of sport and recreation will be further strengthened in Policy TCC6 which will cross reference

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should be mentioned specifically in the policy including protection against the loss of playing fields given the difficulty in reprovding in an area of this character.			EU1. In addition, the wording in supporting text has been amended to strengthen this objective.

Policy EU2: Urban Greening and Biodiversity

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU2/1	EU2	Strong support for EU2	14	Environment Agency, 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
EU2/2	EU2	Monitoring should be based on a robustly assessed baseline and ensure that the evidence base includes	1	Environment Agency	No change proposed. Applicants would be required to establish baselines through their Green Infrastructure and Open Space Management Plans.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		detailed ecological studies and audits to establish a baseline and gaps.			
EU2/3	EU2	Welcome monitoring reference in EU2 f)	1	Environment Agency	Noted.
EU2/4	EU2	Concerned about weak wording in the opening paragraph of the text. Should revise EU2 to reflect the intention to “secure” rather than “seek to ensure”.	1	LBHF	Change proposed. The wording has been amended to remove 'seek to'.
EU2/5	EU2	lack of monitoring details	1	Friary Park Preservation Group	Noted. OPDC will provide an annual authority monitoring report which will report on progress in delivering Local Plan policies.
EU2/6	EU2	Policy unsound - no justification	1	Local resident	No change proposed. OPDC considers that the policy is sound.
EU2/7	EU2	Need greater emphasis on tree planting and thought to tree planting as part of street design	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy T1 a) provides policy to support delivery of a healthy street network, which promotes the use of street trees. Policy EU2 promotes planting of mature and semi-mature trees along all streets.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU2/8	EU2	Should support provision of allotments, both temporary and permanent	13	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. Policies EU1, P4 and D6 promote the provision of space for local food growing, which would include allotments.
EU2/9	EU2	There should be temporary greening during the construction phases.	13	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. The Local Plan supports the provision of meanwhile uses, including open space, within Policy TCC9.
EU2/10	EU2	Development will disrupt green corridors along railway lines	13	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,	No change proposed. Where a green corridor, SINC and open space is disrupted or impacted on, developers are required to provide equivalent compensation in line with Policy EU2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU2/11	EU2	Development will negatively impact biodiversity	13	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. Policies EU1 and EU2 seek to protect and enhance existing open space and biodiversity, increase green cover and provide a net gain in biodiversity. Where biodiversity is impacted developers will be required to provide equivalent compensation.
EU2/12	EU2	More information is required on Urban Greening Factor	13	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 London Plan sets out more details on the Urban Greening Factor. SPG/SPD will be developed in due course.
EU2/13	EU2	Concern expressed about how variable and diverse urban greening will be.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. The intention is that urban greening will be multi-functional and enhance the biodiversity in the area. An Urban Greening Factor policy has been included in the new draft London Plan

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	(2017), which has been adopted in the OPDC Local Plan. The intention of the Urban Greening Factor is to ensure that a high quality of urban greening is provided.
EU2/14	EU2	Landscape planting should avoid high maintenance costs	13	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. Management and maintenance costs will be taken into account when proposals are submitted by developers. Management and maintenance arrangements are required to be set out as part of Green Infrastructure and Open Space Strategies and Management Plans.
EU2/15	EU2	Semi wild areas should be retained	13	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 intention, set out in EU1 and EU2, is to preserve and enhance wherever possible all areas of existing green space and secure compensation where areas cannot be preserved. These must be of an equal function, quantum and quality. This includes semi wild areas which, where feasible, will be retained. Where invasive and non-native species are identified, these will have to be removed.
EU2/16	EU2	A tree and shrub community nursery/facility should be	13	Grand Union Alliance, Wells House Road	No change proposed. This is outside the scope of the Local Plan and would be

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		established on Wormwood Scrubs		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	assessed against planning policy, which seeks to protect and enhance Wormwood Scrubs and protect its character as MOL.
EU2/17	EU2	Policy lacks necessary strategy, analysis and proposals	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the policies and supporting studies provide a robust level of evidence appropriate to the role and function of the Local Plan.
EU2/18	EU2	The canal warrants particular biodiversity policy focus and additional green corridors should be created across boroughs.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Noted. Policy P3 sets out the importance of the Grand Union Canal to green infrastructure. The Grand Union Canal and the railway embankments are important green corridors that contain a good range of species. They will continue to be protected and enhanced. The Grand Union Canal is also part of the Blue Ribbon Network which the London Plan seeks to preserve and enhance.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
EU2/19	EU2	EU2 b)vi) could be strengthened	1	Environment Agency	Change proposed. The supporting text has been strengthened to support the use of resilient species on buildings and in the public realm that are cost effective to maintain over the long term.
EU2/20	EU2	If plans to widen Victoria Road are carried out, mitigating action should be taken to replace lost trees and vegetation.	1	Douglas Hunt	Change proposed. The loss of trees on Victoria Road and Cerebros Gardens will result from changes caused by HS2, which is governed by a separate legislative process. HS2 are guided by the London to West Midlands Act 2017. However, OPDC will seek to ensure that where vegetation or habitat is lost, it is replaced. The supporting text in EU2 has been amended to strengthen this requirement. OPDC will work with HS2 to encourage them to replace any planting that is lost with like for like planting. In addition, EU1 requires that 3 new parks are provided across the Old Oak area and 30% of the area is set aside for public open space.
EU2/21	EU2	Need a policy to address light pollution and its impacts on wildlife and amenity.	15	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Change proposed. The impact of light pollution is considered in Policy D6. Reference to the need to consider the impacts of light pollution on biodiversity has been added to the supporting text and the policy requires environmental impacts to be considered.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

Policy EU3: Water

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU3/1	EU3	CRT support the use of the canal as an integral part of the strategic urban drainage system subject to modelling and investment in outfalls and other upgrades to ensure the canal network is resilient.	1	CRT	Noted.
EU3/2	EU3	Support for greenfield run off rates	1	RBKC	Noted.
EU3/3	EU3	Policy should clearly state that Counters Creek is at full capacity and no net additional flow can go into the creek from development.	15	RBKC, Old Oak Interim Neighbourhood Forum, 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	Change proposed. The supporting text has been amended to make it clear that Counters Creek sewer is at capacity.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
EU3/4	EU3	Support cross references and reinforcement of SuDS in different policies	1	RBKC	Noted
EU3/5	EU3	Strongly support EU3 but would like to see it strengthened by including Water Framework Directive and River Basin Management Plan requirements, WFD improvement measures, and references to retrofitting existing uses.	1	Environment Agency	Change proposed. Noted, the Water Framework Directive and River Basin Management Plan is addressed nationally through legislation and published guidance. OPDC have addressed the Water Framework Directive in the Integrated Water Management Study which supports the Local Plan. OPDC therefore believes that the framework has been adequately referenced. Reference to both the Water Framework Directive and Thames River Basin Management Plan has now been appropriately referenced in the policy an supporting text.
EU3/6	EU3	There is concern that the hierarchy does not include collection of rainwater and greywater for re-use. The current London Plan Drainage Hierarchy puts rainwater harvesting at the top of the list, so there is an inconsistency in the approach of Policy EU3.	1	LBHF	No change proposed. The Local Plan does include in EU3 delivery of on-site water re-use technologies including rainwater and grey water recycling where these are viable. OPDC's evidence shows this will be most viable in non-residential developments, hence the slant of the policy. In addition, the Local Plan does not seek to repeat London Plan policy as all developments will be expected to conform with NPPF and London Plan policy.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU3/7	EU3	Para 6.33 should be strengthened to require that developments achieve the highest standards of sustainable development, not just “seek to ensure” this.	1	LBHF	No change proposed. OPDC cannot ensure that developments will achieve the highest standards of sustainable development but will do everything in its power to promote sustainable development subject to viability.
EU3/8	EU3	In para 6.38 the use of the Grand Union Canal as part of an integrated approach to managing surface water run-off can only work if the Canal and River Trust provide consent for such discharges. OPDC should work closely with CRT to ensure that this option is maximised where feasible.	1	LBHF	No change proposed. OPDC are working with CRT and CRT have responded positively to this policy.
EU3/9	EU3	The emphasis in para 6.39 on the use of above ground measures in preference to underground attenuation tanks is welcomed.	1	LBHF	Noted
EU3/10	EU3	lack of monitoring details	1	Friary Park Preservation Group	No change proposed. Monitoring will be included in the Authority Monitoring Report.
EU3/11	EU3	Add "ensure sustainable drainage over the whole development area does not adversely affect Wormwood Scrubs, and takes measure to avoid flooding"	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. The use of sustainable drainage will have to be designed so that it does not adversely impact on the area as a whole and MOL is already protected in Policy EU1 and EU2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Addressing flooding on the Scrubs is already dealt with in P12.
EU3/12	EU3	This policy should refer to the potential use of the canal for heating and cooling	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy EU10 refers to the use of the canal as a potential source of heat and CRT have responded positively to this suggestion in their response to the consultation. Cooling is also dealt with in the policy but evidence suggests coolth networks will only be appropriate as part of large-scale commercial developments and the phased delivery of these is not likely to occur for another 10+ years.
EU3/13	EU3	The storm relief sewer for Counters Creek is not guaranteed to be delivered and this means the 24,000 homes figure is inadequately evidenced and not justified.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Counters Creek sewer upgrades relate to current capacity problems and do not relate to regeneration in the Old Oak area, where the requirement is to achieve greenfield run-off rates.
EU3/14	EU3	Expressed concern that if strategic SuDS that include	13	Grand Union Alliance, Wells House Road	No change proposed. Noted. OPDC are working with CRT and CRT have

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		use of canal and Wormwood Scrubs is not achieved cost on individual plots will be very high.		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	responded positively to this policy. OPDC will do everything possible to ensure the development is viable without compromising the standards set out in the Local Plan. Achieving greenfield runoff rates is imperative as the sewer network is at capacity and the statutory undertaker has indicated they cannot provide any more capacity. As additional sewage will be generated through the development, rain water will have to be diverted from sewers and treated on site to compensate for the additional flow of sewage.
EU3/15	EU3	Flooding not addressed strategically but Counters Creek imposes considerable constraints	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC shares the consultees concerns and contends that flooding has been extensively addressed throughout the Local Plan, supported by the Integrated Water Management Study which accompanies the plan.
EU3/16	EU3	Concerns expressed about the impact of London water issues on viability of development	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. OPDC shares the consultees concerns about water issues and for this reason has addressed water issues in Policy EU3 and in the Integrated Water Management Study which accompanies the Plan. As well as seeking

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	funding from developers, in accordance with Policy DI1, OPDC will pursue alternative funding sources to deliver required infrastructure.
EU3/17	EU3	There is a lack of space for strategic SuDS and this needs to be resolved to address flood issues	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers consider that provision of strategic SuDS has been considered. SuDS will be integrated onto sites, into the canal where appropriate and subject to agreement with the CRT and into streets and open space provision.
EU3/18	EU3	Figure 6.5, pg. 167 should identify any designated Critical Drainage Areas within the OPDC area and clarify the locations in which Flood Risk Assessments are required.	1	RBKC	Change proposed. The critical drainage areas are covered in the Integrated Water Management Study which was published alongside the Local Plan. This includes a list of surface water critical drainage areas, and a plan (Figure C2) showing their location. Policy EU3 has been modified in order to reinforce the requirement for all developments to undertake FRAs for schemes meeting the thresholds set out in DEFRA and EA guidance.
EU3/19	EU3	Para 6.35 should refer to Boroughs roles as Lead Local Flood Authorities.	1	LBHF	Change proposed. The paragraph has been amended to reinforce the Local Authorities role as Lead Flood Authority

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU3/20	EU3	The need to carry out a Flood Risk Assessment in para 6.41 should not be limited to just major developments.	1	LBHF	Change proposed. The wording has been amended to align the requirements with Environment Agency and DEFRA guidance.
EU3/21	EU3	In para 6.42 it may not be appropriate to exclude all residential development from the requirement to use rainwater/greywater systems, as there could be some residential developments where this would be suitable.	1	LBHF	Change proposed. The Plan has been amended to require development to implement measures, but with the priority being within non-residential developments.
EU3/22	EU3	In para 6.43 OPDC could set a more stringent policy in terms of use of the 105 litres per day target.	1	LBHF	No change proposed. The policy seeks to meet or exceed the 105 litres per day target.

EU4: Air Quality

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU4/1	EU4	Concerns regarding noise, air and light pollution from construction over the next 10 to 30 years.	12	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton,	"Noted. Policy EU4 and table 6.1 provide policy for minimising air pollution and making a positive contribution to overall improvement in air quality. Policy EU5 provides policy for mitigating impacts of noise and vibration. In addition, the draft London Plan provides policies on mitigating pollution from construction which

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Wells House Road Residents Association	developers working in the OPDC area will be subject to. Change proposed. OPDC has amended D6 to provide clearer guidance for addressing light pollution."
EU4/2	EU4	P3 should support electrical connections along the canal to reduce air pollution from boats.		CRT	No change proposed. OPDC and CRT are in discussion about how the canal can be enhanced both for barges/boats and other users and are jointly developing a Canal Waterspace Strategy. Policy P3 promotes enhancement and use of the canal. Providing electric charging points will be considered through those discussions.
EU4/3	EU4	Strongly support EU4	1	Environment Agency	Noted.
EU4/4	EU4	Area has poor air quality and tall buildings will make this worse.	2	Local residents (Ron Thorp and Douglas Hunt)	No change proposed. Policy EU4 recognises the potential impact tall buildings have on air quality and seeks to mitigate this. The Supporting Air Quality Study that accompanies the draft Local Plan also seeks to address this. Developers will be required to demonstrate how they contribute to new draft London Plan requirements to deliver Air Quality Positive development.
EU4/5	EU4	lack of monitoring details but support air quality monitoring point in old oak lane	19	Friary Park Preservation Group, Martin Cain, TITRA (Mark Walker, Nicky Guymer, Bruce Stevenson), Midland Terrace Residents (Ewa Cwirk-Godycka, Nye Jones) , Wells House Road	No change proposed. Monitoring will be included in the Authority Monitoring Report.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	
EU4/6	EU4	The Plan should require that no new development takes place in areas exceeding acceptable EU standards of maximum air and noise pollution. Sensitive uses should not be permitted in areas with poor air quality.	6	Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	No changed proposed. Policy EU4 requires proposals to mitigate impacts to acceptable levels. It is not considered sound to implement a blanket ban on sensitive uses in such locations where impacts can be appropriately mitigated. Further, in line with the draft London Plan, OPDC will seek to ensure development contributes to air quality positive development.
EU4/7	EU4	Text from table 6.1 should be strengthened, and included in each place policy.	6	Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	No change proposed. Policy EU4 will need to be complied with by all developers and will apply to all aspects of their proposal. It is therefore not considered necessary to include the table in each place policy. Further, in line with the draft London Plan (2017), all development will be required to demonstrate how it is contributing to the Mayor's air quality positive objective.
EU4/8	EU4	Support policy but should be clearer who the controlling and monitoring bodies are	14	Hammersmith Society, Tom Ryland, Wells House Road Residents	No changed proposed. Reference to the appropriate controlling and monitoring

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	bodies is made in the Local Plan where appropriate.
EU4/9	EU4	An additional policy (EU4.i) should require all major developments to use low emission vehicles during construction.	15	Old Oak Interim Neighbourhood Forum (Mark Walker), TITRA (Dave Turner, Mark Walker) , 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. Such a policy, although admirable, would require many SME companies to upgrade their fleets, meaning that they would be unlikely to tender for construction contracts in the OPDC area -thus impacting significantly on small businesses which OPDC is seeking to support. OPDC will however keep the potential for such a policy under review for consideration as part of future iterations of the Local Plan.
EU4/10	EU4	Air quality policy is weak and ineffective	13	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,	Change proposed. The policy requiring Air Quality Assessments has been significantly strengthened to address stakeholder comments.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU4/11	EU4	A Low Emissions Neighbourhood (LEN) should be included as a policy and not just in the supporting text	13	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. This is not something that can be designated through the Local Plan as it is a TfL scheme and applications must be made to TfL. However, the establishment of a LEN is promoted in the Plan and OPDC will review options to establish a LEN and promote better air quality in partnership with the GLA, TfL and local businesses and residents.
EU4/12	EU4	The policy doesn't provide a convincing strategic approach that will deliver good air quality in an area where growing number of people will live	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers believe the policy and supporting study are sound and will help to improve air quality in the area.
EU4/13	EU4	Proactive measures including green walls and planting should be adopted to reduce exposure to air pollution	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. Policy EU1 and EU2 encourage the use of open space, green infrastructure, green walls and planting more generally, which will support enhancements to air quality.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall	
EU4/14	EU4	As LBHF is an Air Quality Management Area under the 1995 Environment Act – Part IV, impacts of any development must be agreed with the Council. This should be established in this policy particularly as the Council is financially liable for EU fines if it fails to meet minimum standards for air quality. Policy EU4 should take into account LBHF policy CC10.	7	LBHF, Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	Change proposed. The role of the Local Authority for Air Quality has been emphasised in the supporting text. In addition, the requirement for an Air Quality Assessment on major developments, which was previously set out in table 6.1 and the accompanying Air Quality Study has been given more prominence and included as a policy requirement, which closely aligns with the LBHF policy.

Policy EU5: Noise and Vibration

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU5/1	EU5	Poor quality construction and noise levels from Heathrow are incompatible with development	1	Local resident (Ron Thorpe)	No change proposed. OPDC cannot control the impacts from Heathrow but OPDC will work with developers, HS2, Heathrow and other projects to coordinate and minimise the impacts of major development on the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					area. Development will be expected to meet acceptable noise standards.
EU5/2	EU5	Lack of monitoring details	1	Friary Park Preservation Group	No change proposed. Monitoring will be included in the Authority Monitoring Report.
EU5/3	EU5	The Plan should require that no new development takes place in areas exceeding acceptable EU standards of maximum air and noise pollution, for example along Scrub Lane (Mitre Yard).	6	Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	No change proposed. All new development will be required to demonstrate compliance with the most relevant and current building standards as set out in EU5, air quality policy EU4 and with Local Authority policies in their role as the responsible bodies for air quality.
EU5/4	EU5	Support policy but need to be clearer who controlling and monitoring bodies are	13	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 changed proposed. Reference to the appropriate controlling and monitoring bodies is made in the Local Plan where appropriate.
EU5/5	EU5	Policy not broad or proactive enough and should also include other emissions like odour, light, dust and risk from substances	13	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,	No change proposed. These issues are dealt with at relevant points in the local Plan, but many of these points are addressed through the London Plan including in the Design and Construction SPG and environmental legislation and do not warrant repetition in OPDC's Local Plan. Light is dealt with in Policy D6 and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	environmental matters arising from construction activities (e.g. dust) are dealt with through Policy EU4 and T8.
EU5/6	EU5	Need to protect tranquil areas and improve the noise environment through the policy	13	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 EU5 seeks to protect and enhance noise quality.

Policy EU6: Waste

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/1	EU6	Park Royal should contribute more to waste management process. The Local Plan places too much reliance on the Powerday site in Old Oak. Plan should share out waste processing across Old Oak and Park Royal. There should be a stronger emphasis on waste being managed at source.	13	Old Oak Interim Neighbourhood 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	No change proposed. Policy EU6 and its supporting text refers to a number of waste sites across its area. The West London Waste Plan is part of OPDC's Development Plan and this includes more detail on waste sites identified in Park Royal. Policy EU7 on the Circular Economy approach will help ensure that less waste is generated and Policy EU6 requires Site Waste Management Plans to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	demonstrate that waste is being managed, both during construction and operation, as high up the waste hierarchy as possible.
EU6/2	EU6	It is not possible to safeguard the Twyford Waste Transfer Station site as implemented permission exists to redevelop part of the site. Policy should reflect WLWP position. Figure 6.9 should be updated to reflect the correct land ownership details for the safeguarded Abbey Road waste site		Turley (on behalf of Ashia Centur Limited)	Change proposed. Figure supporting EU6 has been amended to reflect the boundary for the Twyford Waste Transfer Station allocated in the adopted West London Waste Plan.
EU6/3	EU6	Support policy reference to guidance on recycling and storage of waste		LWARB; Environment Agency	Noted.
EU6/4	EU6	Upholding policies in WLWP is welcomed, including the safeguarding of existing sites		London Borough of Ealing;	Noted.
EU6/5	EU6	Support EU6, including safeguarding sites, compensatory site provision, enclosure of facilities		Environment Agency	Noted.
EU6/6	EU6	Support EU6	15	Friary Park Preservation Group; Hammersmith Society; Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU6/7	EU6	The division between the roles and responsibilities of OPDC and the local authorities should be made clear.	13	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. More text has been provided to clarify the roles and responsibilities related to waste.
EU6/8	EU6	Changes to London Plan waste apportionment targets might result in a need to review WLWP and the identification of more waste sites. Preference for OPDC to have a separate apportionment target and Local Plan should be future proofed to allow for this scenario.		London Borough of Ealing	Change proposed. The current London Plan is adopted and therefore has significant weight as part of OPDC's Development Plan. The supporting text has been updated to recognise that a new Draft London Plan has been published and the potential need for a future review of policy EU6, if changes are required in order to help host boroughs to meet higher waste apportionment targets. The new draft London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/9	EU6	Approach to compensatory provision should be revised to prioritise OPDC's area. Need to demonstrate that approach would be achievable/deliverable.		London Borough of Ealing	Change proposed. The sequential approach has been amended to prioritise finding sites within the OPDC area. In line with policy WLWP 1, the next step in the sequential process is for compensatory provision to made elsewhere within the relevant waste plan or authority area, this would include the whole of Ealing as well the rest of the boroughs covered by the WLWP. The applicant would need to demonstrate that the compensatory provision is available and therefore deliverable.
EU6/10	EU6	Clarify required on the status of the part of the WLWP relative to OPDC's Local Plan and to avoid duplication and inconsistencies.	14	London Borough of Ealing; Hammersmith, 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 adopted WLWP policies will remain in place for part of the OPDC area that includes land within the London Boroughs of Brent and Ealing. This is already reflected in EU6 which requires proposals to comply with the WLWP policies where applicable. OPDC's Local Plan needs to include waste policies to cover the rest of its area which includes land within the London Borough of Hammersmith and Fulham, and therefore some duplication will be inevitable but necessary to provide comprehensive coverage of OPDC's area.
EU6/11	EU6	No policy on windfall sites so it is assumed WLWP policy 3 will continue to apply		London Borough of Ealing	No change proposed. The adopted WLWP policies will remain in place for part of the OPDC area that includes land within the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					London Boroughs of Brent and Ealing. This is already reflected in EU6 which requires proposals to comply with the WLWP policies where applicable.
EU6/12	EU6	Plan should identify all existing licenced waste management sites for safeguarding as per WLWP.		London Borough of Ealing	Change proposed. Policy EU6 has been amended to refer to all existing sites and the supporting text refers to the WLWP for further information.
EU6/13	EU6	Existing waste facilities, particularly Channel Gate, Quattro and Powerday. Powerday negatively impact residential areas and should not remain in its current location or increase its throughput. Greater emphasis should be on investing in the circular economy and at source disposal.	28	Bernie Timmins; Tim Potter; Lori Wiechec; Stuart McCaffer; Scott Cawley; Noam Lesham; Nicky Guymmer; Bruce Stevenson; Oonagh Heron; Mark Walker; Jason Salkely; Dave Turner; TITRA; Grand Union Alliance; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Powerday is required to meet LBHF's waste apportionment targets and therefore it will continue to be safeguarded as a waste site. The other waste sites in the Plan have been identified as safeguarded sites in the adopted West London Waste Plan. These sites provide certainty that waste apportionment targets in Brent and Ealing can be met through the implementation of the WLWP. OPDC is not responsible for issuing waste permits or regulating waste management sites; these responsibilities are undertaken by the Environment Agency or the boroughs' Environmental Health departments. However policy EU6 seeks to ensure future proposals adequately mitigate their impact on amenity.
EU6/14	EU6	OPDC should continue to work positively with Western Riverside		Mayor of London	No change proposed. OPDC is co-operating with host boroughs to ensure

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		WPAs and other stakeholders to meet apportionment targets, and consider potential for additional capacity.			that their waste apportionments can be met as a priority in line paragraph 5.80 of the London Plan. OPDC host boroughs are Hammersmith and Fulham (LBHF), Brent and Ealing. The Waste Apportionment Study demonstrates how OPDC is meeting this obligation. In addition to this, OPDC has been working with the wider WRWA group (including LBHF) to prepare a joint Waste Technical Paper. This Waste Technical Paper forms part of the evidence base for OPDC's Local Plan. OPDC has no apportionment target and there is no formal agreement on pooling apportionment amongst the WRWA boroughs.
EU6/15	EU6	Object to proposal for Powerday site to become an energy from waste facility. Energy from waste using incineration is a fundamental misunderstanding of circular economy principles.	22	Nicky Guymer; Bruce Stevenson; Oonagh Heron; Mark Walker; Old Oak Interim Neighbourhood Forum; Dave Turner; TITRA; Grand Union Alliance; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. The Utilities Study has assessed options and sets out further detail on the approach and assessment of energy sources for the strategic district heating network. The heat source for an area wide network is yet to be determined. Energy from waste has the potential to be the largest and most viable low carbon heat source but there are other potential secondary heat sources that have been investigated, including ground source heat pumps and heat recovery from the Grand Union Canal. The waste hierarchy includes 'other recovery' as a step prior to

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				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	disposal and it at this stage in the hierarchy that energy from waste can make a contribution. Policy EU6 is clear that any such proposal should not shift the burden within the waste hierarchy from prevention, re-use or recycling.
EU6/16	EU6	Policy for managing construction waste is unrealistic and potentially harmful to local residential areas.	19	Nicky Guymer; Bruce Stevenson; Mark Walker; Dave Turner; TITRA; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The construction industry produces a significant amount of waste each year so it is right that OPDC should have ambitious targets for the re-use and recycling of construction materials. Major developments will be required to demonstrate how a minimum of 95% of excavation, demolition and construction waste will be re-used and/or recycled in line with the London Plan.
EU6/17	EU6	Policy requiring higher levels of recycling from residents is weak and ineffective. Policy should require more from developers as part of planning process. Need to fully integrate environmental infrastructure within housing developments and coordinate waste and recycling procedures across borough boundaries.	20	Nicky Guymer; Bruce Stevenson; Oonagh Heron; Mark Walker; Dave Turner; TITRA; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. Brent, Ealing and Hammersmith and Fulham Councils are responsible for waste collection within the OPDC area. Policy EU6 requires developers to put the correct measures in place to ensure that recycling rates can be improved through alignment with boroughs collection/management methods and the provision of appropriate details and training for occupants.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton; Grand Union Alliance	
EU6/18	EU6	Policy places reliance on out of date West London Waste plan, out of step with down-sized targets for waste in the current London Plan	13	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. Powerday is required to meet LBHF's waste apportionment targets and therefore it will continue to be safeguarded as a waste site. The other waste sites in the Plan have been identified in the adopted West London Waste Plan (WLWP). The adopted WLWP policies will remain in place for part of the OPDC area that includes land within the London Boroughs of Brent and Ealing. It is noted that a new draft London Plan (2017) has been published with higher apportionment targets set out for Brent and Ealing and a reduced overall target for Hammersmith and Fulham by 2041. OPDC will continue to work positively with the host boroughs to help demonstrate how any revised London Plan apportionment targets would be met, and if necessary, this may trigger the review of this policy and relevant policies in the WLWP.
					Policy EU6 already includes criteria to allow for compensatory provision if waste sites are lost to a non-waste uses.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/19	EU6	Need to fully integrate environmental infrastructure within housing developments and coordinate waste and recycling procedures across borough boundaries.	13	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. Brent, Ealing and Hammersmith and Fulham Councils are responsible for domestic waste and recycling within the OPDC area. Policy EU6 requires developers to put the correct measures in place to ensure that recycling rates can be improved through alignment with boroughs collection/management methods and the provision of appropriate details and training for occupants.
EU6/20	EU6	There are major flaws in the evidence base behind the policy and that as a result the OPDC is failing to meet the London Plan requirement to ensure that Boroughs apportionment targets are met.		North London Waste Plan	No change proposed. The Waste Apportionment Study demonstrates how OPDC is helping the host boroughs to meet their apportionment. LBHF have confirmed that they support the approach to safeguarding Powerday to meet their targets.
EU6/21	EU6	Policy should focus on maximum throughput achieved over a five year period where compensatory provision is required.		North London Waste Plan	Change proposed. The supporting text has been amended to refer to mayoral guidance.
EU6/22	EU6	OPDC have been working effectively with Hammersmith & Fulham Council as well as the other boroughs within the WRWA area on waste matters.		London Borough of Hammersmith and Fulham	Noted.
EU6/23	EU6	Support safeguarding of the Powerday site.		London Borough of Hammersmith and Fulham	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/24	EU6	Concerned that policy does not afford safeguarded sites enough protection		London Borough of Hammersmith and Fulham	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non-waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/25	EU6	The capacity at EMR should be appropriately replaced, with priority given to any potential suitable locations within LBHF & then the WRWA area to ensure EMR capacity is not lost.		London Borough of Hammersmith and Fulham	No change proposed. The sequential approach prioritises finding sites within the OPDC area as this will give greater flexibility and a wider area of search to find suitable sites for waste. The sequential approach also includes a step which directs provision to the appropriate waste plan or authority area.
EU6/26	EU6	The wording should be enhanced to better explain how the re-provision would work and to confirm that this would only apply to non safeguarded sites		London Borough of Hammersmith and Fulham	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/27	EU6	The wording of para 6.76 could be improved by referencing other relevant stakeholders		London Borough of Hammersmith and Fulham	Change proposed. Text updated to clarify that a range of stakeholders will be involved.
EU6/28	EU6	Planning for waste management is a strategic (cross-Borough) matter and subject to the legal		Royal Borough of Kensington and Chelsea	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		requirement of the Duty to Cooperate. OPDC has waste planning responsibilities, it does not have a waste apportionment target which it is required to meet.			
EU6/29	EU6	OPDC has waste planning responsibilities but it does not have a waste apportionment target which it is required to meet. OPDC has resisted committing to pooling apportionment targets and capacity with the Western Riverside WPAs.		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. However, it is noted that the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.
EU6/30	EU6	OPDC is releasing EMR on basis that it is not needed. However, the EMR facility is a vital contributor to the apportionment capacity for the Western Riverside WPAs.		Royal Borough of Kensington and Chelsea	No change proposed. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority. OPDC's Waste Apportionment Study demonstrates how OPDC is helping host boroughs to meet their targets and the rationale for releasing the EMR site. Notwithstanding this, EU6 includes a requirement for compensatory provision if any waste site is lost to a non waste use.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/31	EU6	If compensatory EMR capacity is not provided within LBH&F or the WR area the potential for pooling apportionment will be permanently lost. Suggest that Policy is amended to ensure replacement capacity is provided within the OPDC host borough in which the facility is located as a priority.		Royal Borough of Kensington and Chelsea	No change proposed. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority. OPDC's Waste Apportionment Study shows that the Old Oak Sidings (Powerday site) can meet LBHF's apportionment target and also provides a rationale for releasing the EMR site. The sequential approach in EU6 prioritises finding sites within the OPDC area as this will give greater flexibility and a wider area of search to find suitable sites for waste. The sequential approach also includes a step which directs provision to the appropriate waste plan or authority area.
EU6/32	EU6	Further information for optimising use of Powerday is required.		Royal Borough of Kensington and Chelsea	Change proposed. Additional text has been included to support a more efficient use of the Powerday site. Policies P1, EU6, EU10 and T7 also include measures/requirements that will ensure that the site is maximised. The Waste Apportionment Study includes more information on the potential capacity of the Powerday site.
EU6/33	EU6	Capacity is committed to assist RBKC in the current adopted LBHF Core Strategy. Disappointed to see that the arrangement has not		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		been reflected in the OPDC Local Plan.			<p>Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. However, it is noted that the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.</p>

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/34	EU6	There is no detail in the Local Plan on how the district heating scheme at Powerday will operate.		North London Waste Plan	No change proposed. The Utilities Study has assessed options and sets out further detail on the approach and assessment of energy sources for the strategic district heating network. The heat source for an area wide network is yet to be determined. Energy from waste has the potential to be the largest and most viable low carbon heat source but there are other potential secondary heat sources that have been investigated including ground source heat pumps and heat recovery from the Grand Union Canal.
EU6/35	EU6	The wording could be enhanced to better explain how re-provision would work for non-safeguarded waste sites. Amend para 6.74.		LBHF	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/36	EU6	Improve wording in para 6.76 to say OPDC will work with operators of waste sites, the EA, waste authorities, LAs, businesses and residents to find ways to introduce energy generation in a way that delivers benefits and addresses adverse impacts to the area.		LBHF	Change proposed. Text updated to clarify that a range of stakeholders will be involved.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/37	EU6	Plan does not adequately deal with waste plants in the area	12	Wells House Road Residents (Joanna Betts, Nicholas Kasic, Marc and Caroline Francis, Patrick Munroe, Lily Gray, Catherine Sookha, Ralph Scully, Mark Walker, Lynette Hollender, Jeremy Aspinall, Thomas Dyton)	No change proposed. Waste facilities are already covered by Policy EU6 and policies in the West London Waste Plan.
EU6/38	EU6	Changes to London Plan waste apportionment targets might result in a need to review WLWP and the identification of more waste sites. Preference for OPDC to have a separate apportionment target and Local Plan should be future proofed to allow for this scenario.		London Borough of Ealing	No change proposed. The current London Plan is adopted and therefore has significant weight as part of OPDC's Development Plan. The supporting text has been updated to recognise that a new Draft London Plan has been published and the potential need for a future review of policy EU6, if changes are required in order to help host boroughs to meet higher waste apportionment targets. The new draft London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.
EU6/39	EU6	Approach to compensatory provision should be revised to prioritise OPDC's area. Need to demonstrate that approach would be achievable/deliverable.		London Borough of Ealing	Change proposed. The sequential approach prioritises finding sites within the OPDC area as this will give greater flexibility and a wider area of search to find suitable sites for waste. The sequential approach also includes a step which directs provision to the appropriate waste plan or authority area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/40	EU6	Clarify required on the status of the part of the WLWP relative to OPDC's Local Plan and to avoid duplication and inconsistencies. The division of responsibilities between OPDC and local authorities should be made clear.	14	London Borough of Ealing; Hammersmith, 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 adopted WLWP policies will remain in place for part of the OPDC area that includes land within the London Boroughs of Brent and Ealing. This is already reflected in EU6 which requires proposals to comply with the WLWP policies where applicable. OPDC's Local Plan needs to include waste policies to cover the rest of its area which includes land within the London Borough of Hammersmith and Fulham, and therefore some duplication will be inevitable but necessary to provide comprehensive coverage of OPDC's area.
EU6/41	EU6	OPDC's policy is major impediment to pooling and has not taken into account the wider Western Riverside joint working relationship or aims when developing the Plan and therefore has not fulfilled the Duty to Cooperate		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. It is noted that

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.
EU6/42	EU6	Further information for optimising use of Powerday is required.		Royal Borough of Kensington and Chelsea	Change proposed. Additional text has been included to support a more efficient use of the Powerday site. Policies P1, EU6, EU10 and T7 also include measures/requirements that will ensure that the site is maximised. The Waste Apportionment Study includes more information on the potential capacity of the Powerday site.
EU6/43	EU6	Capacity is committed to assist RBKC in the current adopted		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		LBHF Core Strategy. Disappointed to see that the arrangement has not been reflected in the OPDC Local Plan.			<p>WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. It is noted that the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain</p>

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.
EU6/44	EU6	The wording could be enhanced to better explain how re-provision would work for non-safeguarded waste sites. Amend para 6.74.		LBHF	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/45	EU6	Plan fails to control waste plants in the area	12	Wells House Road Residents (Joanna Betts, Nicholas Kasic, Marc and Caroline Francis, Patrick Munroe, Lily Gray, Catherine Sookha, Ralph Scully, Mark Walker, Lynette Hollender, Jeremy Aspinall, Thomas Dyton)	No change proposed. The policy sets out the strategy for managing waste across the OPDC area. All of the sites identified are required to help meet the waste management needs of Brent, Ealing and Hammersmith and Fulham. OPDC is not responsible for issuing waste permits or regulating waste management sites; these responsibilities are undertaken by the Environment Agency or the boroughs' Environmental Health departments. However policy EU6 seeks to ensure future proposals adequately mitigate their impact on amenity.
EU6/45	EU6	Figure 6.9 should be updated to reflect the correct land ownership details for the safeguarded Abbey Road waste site	1	Turley (on behalf of Ashia Centur Limited)	Change proposed. The boundary of the site identified as safeguarded for waste will refer to the WLWP for a detailed boundary.

Policy EU7: Circular and Sharing Economy

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU7/1	EU7	LWARB strongly support the inclusion of a policy devoted to the circular economy in the Local Plan.	1	LWARB	Noted
EU7/2	EU7	Strongly support the requirement for a circular and sharing economy statement and see OPDC as leading the way. LWARB would like to support development of circular economy SPG.	14	LWARB, 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
EU7/3	EU7	Support recognition that circular economy offers opportunity to support growth and innovation in Park Royal.	1	LWARB	Noted.
EU7/4	EU7	Fully support Policy EU7 on the Circular and Sharing Economy	1	North London Waste Plan	Noted
EU7/5	EU7	Policy is potentially too onerous and beyond what is required of development elsewhere in London and will restrict development at Old Oak. Sustainability policies should be proportionate and		Old Oak Park Ltd	No change proposed. OPDC considers that resource utilisation is a major issue that concerns large scale regeneration projects. The requirement for a Circular Economy Statement is now also a requirement in the new draft London Plan. Finding ways to minimise resource use and waste and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		appropriate when viewed alongside other requirements.			increase reuse and resource recovery over the life of the project will help reduce the embodied carbon impacts of the development. Further it supports the mayor's London Environment Strategy aspirations, efficient use of buildings, support for circular economy initiatives, waste management and clean tech employment targets. The London Plan and the London Environment Strategy requires OPDC to take a lead in promoting best practice in sustainable regeneration including in resource management. Waste and materials use are major issues in the construction sector and leading construction companies are starting to establish circular economy and resource efficient strategies that support this policy.
EU7/6	EU7	Support circular economy recommendations and opportunities, and would like to work with OPDC to capitalise on the opportunities that exist in Park Royal to establish the area as a leader in this area.	1	Park Royal Business Group	Noted. OPDC welcome the opportunity to work with PRBG to promote the circular economy in Park Royal.
EU7/7	EU7	lack of monitoring details	1	Friary Park Preservation Group	No change proposed. Monitoring will be included in the Authority Monitoring Report.
EU7/8	EU7	policy lacks clarity or specific requirements and examples	13	Grand Union Alliance, Wells House Road	No change proposed. OPDC believe the policy and supporting study on the circular

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	economy set out clear requirements and provide many examples and opportunities for adoption of the circular economy.
EU7/9	EU7	Questions whether EfW is a circular solution	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believe EfW can be considered a circular solution if carefully and efficiently managed, where careful attention is paid to ensuring only appropriate materials are used, where appropriate technologies to screen, bail and treat the waste are used and heat networks provided to ensure the EfW makes a significant contribution to reduction in carbon emissions. In addition, EfW would not be permitted if it impacts inappropriately on air quality. As a matter of principle, OPDC promote the adoption of the waste hierarchy and encourage waste to be recycled as high up the hierarchy as possible in line with the existing and draft London Plan policy (2017).

Policy EU8: Sustainable Materials

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU8/1	EU8	Sustainability considerations need to be balanced with specific site conditions and viability.	1	Castlepride Ltd	Noted. This is recognised in Policy D11.
EU8//2	EU8	The use of sustainable materials can only be considered with reference to the need to prioritise compliance with fire safety and other safety critical Building Regs. Amend bullet point (g)	1	LBHF	No change proposed. OPDC agree that buildings and the choice of materials, components and systems must comply with fire safety and other safety critical Building Regs. OPDC do not consider that this policy in any way challenges that position. The requirement to conform with safety and other building regulations falls outside of planning but reference to fire safety has been made in Policy D4.
EU8//3	EU8	Support the policy but need to consider the outcome of the Grenfell public inquiry.	13	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. Reference has been made to fire safety in policy D4.
EU8/4	EU8	Policy fails to address embodied carbon and could	13	Grand Union Alliance, Wells House Road	No change proposed. Policy EU8 e) does seek to address embodied carbon. OPDC will

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		adopt approaches used by 6 LAs across the England,		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	also be developing an Environmental Standards SPD, which will further consider approaches to embodied carbon.
EU8/5	EU8	Need to address issue of indoor air quality in policy	1	Local Resident (Adrian Lafond)	Change proposed. Policy EU8 promotes the use of healthy materials and emphasises the importance of material selection and adequate ventilation for example in promoting good indoor air quality. Minor changes have been made to the supporting text.
EU8/6	EU8	Clarify wording in policy h) so that it is clear that 20% of materials should be from recycled or reused content for buildings, and infrastructure and landscape separately.	1	LWARB	Change proposed. The wording has been amended to make this clear.

Policy EU9: Minimising Carbon Emissions and Overheating

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU9/1	EU9	Welcome Para 6.100 on production of SPD guidance	1	LBHF	No change proposed. OPDC will adopt the draft London Plan approach to off-setting.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		on the carbon price to be charged and encourage OPDC to make this a priority. In particular clarity on how payments will be organised is necessary.			SPD will be developed in due course setting out OPDC's approach to carbon off-setting.
EU9/2	EU9	Policy not sound. No justification provided	1	Friary Park Preservation Group	No change proposed. OPDC officers believe the policy and supporting study are sound and will help to minimise carbon emissions and overheating in compliance with the London Plan.
EU9/3	EU9	Need to reinstate targets from Reg 18 and add reference to embodied carbon and building reuse	13	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. Embodied carbon is addressed in EU8. The carbon targets in the Reg 18 plan are either included as they form part of National Policy or London Plan policy, which all development is required to conform with, or because it has been superseded. for example, all new homes now have to be zero carbon by 2016 as per the London Plan and Government legislation requires UK to reduce its carbon emissions by 80% by 2050.
EU9/4	EU9	Housing should be zero carbon including use of solar PV, hot water and green roofs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. OPDC requires housing to comply with the London Plan, which is for development to deliver a 35% reduction over Part L from on-site measures and to demonstrate how it will be fully zero carbon through on-site measures by 2050. OPDC cannot be prescriptive about how zero carbon is achieved. Every effort will be made to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	promote the use of community and building scale renewables where viable. Carbon off-setting will be used where developments cannot achieve carbon reduction targets in line with the London Plan.
EU9/5	EU9	Policy does not align with Mayor's Zero Carbon London by 2050 aspiration or fully address overheating.	13	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 draft Local Plan requires all developers to conform with the London Plan when bringing forward applications.
EU9/6	EU9	Should require new non-residential development to achieve BREEAM outstanding	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers will promote BREEAM outstanding but the Plan has to be viable and BREEAM excellent is considered to deliver a high standard of development whilst being financially viable. OPDC also expect development to contribute to a range of other benefits including delivery of affordable housing and green infrastructure for example.
EU9/7	EU9	Post construction audits are welcome and should include energy performance	13	Grand Union Alliance, Wells House Road Residents Association,	No change proposed. Noted, energy performance will be considered as part of the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	scope. Further guidance on this will be set out in OPDC's Post Occupancy Evaluation SPD.
EU9/8	EU9	The BREEAM requirement should be relocated to Policy D4	1	LBHF	Change proposed. OPDC agrees that it would sit better here and this has been relocated.

Policy EU10: Energy Systems

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU10/1	EU10	CRT support the use of cooling and heating from the canal, and would like to see it strengthened by requiring developers to test feasibility. Also include reference in GUC.18 and EU9.	1	CRT	No change proposed. OPDC and the GLA have policies that promote zero carbon development. In order to achieve this target developers will have to look for the most technically achievable and financially viable way to meet this target. OPDC will promote the use of low carbon heat and cooling networks where appropriate and are investigating different ways to promote this. OPDC will meet with CRT to discuss the potential to use the canal for heating and cooling including technical issues and capital and revenue costs.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU10/2	EU10	Hierarchy needs to consider specific site conditions and viability.	1	Castlepride Ltd	No change proposed. The hierarchy is set out in the London Plan and viability is always a consideration in accordance with national policy and Policy DI1. OPDC will promote adoption of the hierarchy where viable.
EU10/3	EU10	Welcome policy aspirations and requirements to support a low carbon and resilient energy network, but would suggest adding clarification text around demand forecasts for Park Royal.	1	Park Royal Business Group	No change proposed. OPDC accepts that demand needs to be managed and supply enhanced to meet the needs of existing and new businesses.
EU10/4	EU10	Support approach to developing a strategic decentralised heat network, but are concerned that policies, in particular Energy from Waste, are focused on Old Oak and not Park Royal.	1	Park Royal Business Group	No change proposed. Policy EU10 covers both Old Oak and Park Royal. OPDC will work with Park Royal Business Group to investigate opportunities to develop low carbon energy systems in Park Royal where appropriate.
EU10/5	EU10	Request that OPDC considers how the plan might address issues with power capacity to help new and existing businesses operate more effectively.		Segro	No change proposed. The Local Plan deals with the power requirements for new development and the requirements for this are also detailed in the Utilities Study and Infrastructure Delivery Plan.
EU10/6	EU10	Question whether the OPDC area is an appropriate location for energy from waste schemes and if all impacts be sufficiently	14	LBHF, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas	No change proposed. The policy promotes the adoption of the energy hierarchy in conformity with the London Plan and the supporting text highlights some of the low carbon heat sources that could be adopted subject to detailed review

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		mitigated, No evidence base presented. One consultee opposes EfW.		Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	and assessment of impacts. Air quality will have to be addressed as part of any proposal in line with the mayor's policy for Opportunity Areas to be Air Quality Positive, before OPDC will support any specific technology or proposal.
EU10/7	EU10	Policy not sound. No justification provided	1	Friary Park Preservation Group	No change proposed. OPDC officers believe the policy and supporting study are sound and will help to promote the use of low carbon energy systems in compliance with the London Plan.
EU10/8	EU10	As the highway authority and development agency, OPDC should ensure there is accurate mapping of utilities across the area	13	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 is not the Highway Authority. The Host Boroughs have retained their responsibility for highways. However, OPDC in its capacity as a development corporation will work closely with the Boroughs to collect relevant data. Utilities data is presented in OPDC's Utilities Study.
EU10/9	EU10	Support policy but developers may resist this so OPDC needs to assist and manage the delivery of a district energy network	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Noted. OPDC have done work to investigate different options for delivering a low carbon heat and cooling network.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU10/10	EU10	Concern that ambition will not be achieved as policies not ambitious enough	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the policy is ambitious, but has to balance ambition with viability and delivery. OPDC in its role as a development corporation will seek to work with partners, the GLA and government to deliver the highest standards of development possible within the financial and other constraints in which OPDC and its partners have to work.
EU10/11	EU10	Energy centre strategy could impact on amenity of area	13	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. Energy centres would need to accord with other local plan policies such as air quality (EU4) and amenity (D6).
EU10/12	EU10	The decentralised energy system should be resilient and designed around a block level approach	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. OPDC's Utilities Study identifies a strategic network as a preference, which is shown to be more resilient and to potentially better support the Mayor's zero carbon aspirations, but if this is not in place or

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	feasible, the policy supports a development by development, or block by block approach.
EU10/13	EU10	The Policy is generally supported, but reference is needed to require all low carbon and communal combustion systems to demonstrate that they will not have unacceptable impact.	1	LBHF	No change proposed. Reference to the need for any proposal to accord with air quality policy EU4 is included in the supporting text. Any proposal would need to accord with other relevant policies in the local plan and the London Plan. The NPPF is also a material consideration. It is not considered appropriate to repeat this within the policy or supporting text.
EU10/14	EU10	The plan should recognise the need for a cooling network	15	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. This has been added as a policy requirement. Current work shows that this is only likely to be viable however, when delivering large-scale commercial developments.

Policy EU11: Smart Technology

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU11/1	EU11	Support the smart technology policy	1	Association for Consultancy and Engineering (ACE)	Noted.
EU11/2	EU11	It is not the responsibility of the planning system to govern broadband speeds etc and will increase the costs of development		Old Oak Park Ltd	No change proposed. Broadband is now considered a basic need alongside the other utilities. Providing good access to broadband supports social equality and economic vibrancy, which are strategic aims of the Local Plan.
EU11/3	EU11	The OPDC area suffers from poor quality broadband connections, and propose that planning conditions are set requiring developers to install highest level of broadband.	1	Park Royal Business Group	No change proposed. Policy EU11 promotes the provision of the highest quality broadband possible and appropriate ducting provision along key routes. More corporately, OPDC's Park Royal Programme Manager is working with the PRBG to deliver better broadband infrastructure in Park Royal.
EU11/4	EU11	Welcome the OPDC's acknowledgement of the broadband issue, and requests that OPDC takes an active role in instigating upgrades to fibre broadband as a matter of urgency.	1	Segro	Noted. OPDC are currently working on coordinating upgrades with Park Royal Business Group as part of OPDC's corporate activities.
EU11/5	EU11	The lack of detail about smart technology makes this narrative unsound	1	Friary Park Preservation Group	No change proposed. OPDC officers believe the policy and supporting study are sound and will promote the use of smart technologies.
EU11/6	EU11	support policy but consideration should be given	13	Hammersmith Society, Wells House Road	No change proposed. OPDC does not have responsibility or the authority to determine

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		to the ownership, management and storage of data		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	who owns data or how it is managed or stored. OPDC will work with government and others however to review policy and understand its implications for OPDC.
EU11/7	EU11	Policy is dependent on individual developments and fails to take a strategic approach to broadband provision	13	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 development policies in the Local Plan have to focus on development. However, OPDC in its role as a development corporation is reviewing strategic approaches to infrastructure provision including broadband.
EU11/8	EU11	Support policies on Smart Technology, and suggest additional wording to emphasise the opportunity for Park Royal to act as a test bed for new technologies subject to improved broadband infrastructure.	1	Park Royal Business Group	No change proposed. OPDC wishes both Old Oak and Park Royal to be positioned to deliver appropriate smart technologies. OPDC does not consider it appropriate to identify Park Royal in particular, as a location where smart technologies should be tested.

Policy EU12: Extraction of Minerals

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU12/1	EU12	Assessment of applications for extraction of materials should promote use of secondary materials in conformity with principles of the circular economy.	1	LWARB	No change proposed. These policies are referenced as having policy links to this policy and would appropriately apply to any applications for extraction of minerals proposals.
EU12/2	EU12	Support policy on extraction of minerals	13	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.
EU12/3	EU12	The policy lacks sufficient safeguards to address potential for mineral extraction	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the policy does have sufficient safeguards.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU12/4	EU12	the policy fails to safeguard rail and canal facilities in line with NPPF 143	13	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 NPPF requires sites for the transfer of minerals. OPDC supports the transfer of minerals through appropriate sites and supports maximising the use of rail and water to transfer such materials. With regards to mineral extraction, there are no known sites within the OPDC area used for this purpose however will be supported where they meet the aims and objectives of Policy EU12.

Policy EU13: Land Contamination

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU13/1	EU13	Support EU13 but consider the version included in the Regulation 18 consultation to be stronger	1	Environment Agency	No change proposed. OPDC considers that the version in the revised draft Local plan is as strong as the Reg 18 version and that it appropriately addresses comments received on the Reg 18 Local Plan.
EU13/2	EU13	The plan should be regarded as unsound until a comprehensive assessment of land contamination has been undertaken.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. It is not the responsibility of the Local Plan to define exactly what the contamination requirements are. high level assumptions have however been provided within OPDC's Development Infrastructure Funding Study. This would need to be undertaken by developers on a site by site basis and

				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	appropriate remediation undertaken before development can commence.
EU13/3	EU13	The policy is not effective because it fails to take a strategic approach to long term and widespread contamination	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers consider that the policy is effective. Policy EU13 states that OPDC will work collaboratively with developers to consider the feasibility of a strategic approach to the remediation of land. However, OPDC as local planning authority cannot insist on a strategic approach if a strategic approach has not yet been established.

7. Transport

Introduction

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T/1	Introduction	Support text	1	ArtWest	Noted.
T/2	Introduction	""Exemplary" or "excellent" might be better wording	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the current wording to be appropriate.

PolicyT1: Roads and Streets

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/1	T1	Health Streets approach should not be considered above the Sustainable Transport Hierarchy.	1	Brent Cyclists	No change proposed. The Healthy Streets approach and sustainable transport hierarchy complement each other.
T1/2	T1	20mph speed limit should apply to all roads in the area.	1	Brent Cyclists	No change proposed. OPDC will work with the local highway authorities to implement 20mph speed limits, where possible, on roads in the OPDC area.
T1/3	T1	Discouragement is not sufficient - all through traffic should be prevented in new roads, and traffic calming should be avoided due to negative impacts on vulnerable road users.	1	Brent Cyclists	Change proposed. New routes to not allow through traffic. All proposals for new roads or amendments to existing streets will prioritise pedestrians and cyclists as the most important travel modes, followed by public transport and then, where appropriate, private vehicle therefore supporting the most vulnerable road users.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/4	T1	Controlled crossing should be supported by informal crossings.	1	Brent Cyclists	Noted.
T1/5	T1	Do not support any inclusion of shared space for streets acting as through routes.	1	Brent Cyclists	Noted. There is no explicit commitment to providing shared space on streets in the Local Plan. The Healthy Streets approach and sustainable transport hierarchy will be used to inform the design of streets.
T1/6	T1	Lack of clarity about access roads.	1	Friary Park Preservation Group	No change proposed. Information regarding access roads is provided in SP7, the places and in the network diagrams throughout the transport chapter.
T1/7	T1	Main streets won't deliver healthy streets principles	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will work with TfL and the relevant highways authorities to champion the healthy streets principles on all new and existing roads in Old Oak and Park Royal. The intention is for all developments to contribute towards new and improved streets in line with the Healthy Streets Indicators.
T1/8	T1	Policy requires an accompanying map	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. A map is provided alongside Policy SP7 and this map is referenced in the supporting text.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T1/9	T1	Clearer defined east -west routes should be provided	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is proposing to implement a number of new high quality, legible east-west routes across the development area which are indicated in figures within SP7, the transport chapter and the relevant place policies.
T1/10	T1	Retention of Elizabeth Line Depot will prevent delivery of Old Oak High Street and development	13	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. The development of the Elizabeth Line Depot is now identified to be delivered after the plan period. The Old Oak North Development Framework Principles document sets out a new movement network. This includes Old Oak Street (formally Old Oak High Street) and the location of the bridge to Old Oak South and on to Old Oak Common Station. This demonstrates that Old Oak Street can be delivered during the plan period.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/11	T1	Parts c and d are duplicates	13	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. Adoptable standards are what Local Highway Authorities require for taking over maintenance of streets. Relevant standards refers to roads and streets being fit for purpose, with all the necessary components (including segregated components if necessary) being considered.
T1/12	T1	Address existing transport issues of traffic across Park Royal and Old Oak.	13	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. OPDC will work hard to deliver improvements to existing road, streets and transport networks. Ensuring the existing network is fit for purpose is the responsibility of the relevant highway authority. Measures identified in the Infrastructure Delivery Plan to support development will also benefit existing users.
T1/13	T1	Old Oak High Street should only be for walking and cycling. Through routes should be minimised	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. OPDC's Bus Strategy identifies that Old Oak High Street, now named Old Oak Street, should be delivered as a bus route. The street will also deliver high quality walking and cycling

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	infrastructure. Policy T1 discourages through routes.
T1/14	T1	All roads must be adopted and open to all.	13	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. T1 states that all proposals for new roads must be in line with adoptable standards. Decisions over whether streets are adopted rests with the highway authority.
T1/15	T1	There should be a map next to T1 showing the roads and streets and the intended hierarchy	13	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. The proposed connections are provided within SP7. These are referred to in T1.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/16	T1	Policy T1b) should specify how congestion will be addressed and connectivity will be achieved.	13	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. The supporting text expands on how OPDC will approach congestion and connectivity issues.
T1/17	T1	Need to consider how Scrubs Lane and Old Oak Lane will be impacted by vehicle movements from within the Old Oak area.	13	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. The SLDF and VROOLDF consider how both roads will be impacted by development in Old Oak. Required interventions on both streets are included in OPDC's Infrastructure Delivery Plan.
T1/18	T1	Should include a policy that addresses existing traffic problems	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Policy T1 includes provision for improvements to existing streets as well as outlining standards for new streets and roads. OPDC's aspiration is for existing traffic issues to be addressed through a variety of measures outlined in the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	supporting text and included within OPDC's Infrastructure Delivery Plan.
T1/19	T1	References to widening Victoria Road into dual carriageway should be removed.	1	London Borough of Ealing	Change proposed. References to widening Victoria Road into a dual carriageway have been removed. This is not detailed in the transport chapter.
T1/20	T1	Policy should be stronger on requirement for segregated cycle lanes.	1	London Borough of Ealing	No change proposed. The LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.
T1/21	T1	Wording regarding through routes and traffic in unclear.	1	London Borough of Ealing	Change proposed. Amendments have been made in SP7
T1/22	T1	Not clear what "all relevant standards" are and there is no information about on-street electric car charging points and disabled parking	1	London Borough of Hammersmith and Fulham	Change proposed. Text has been amended to ensure it is more specific regarding standards that should be adhered to. Policy T4 provides information on electric car charging points and disabled parking.
T1/23	T1	Positive references to the healthy streets approach are welcomed	1	Mayor of London	Noted.
T1/24	T1	Support for healthy streets	1	NHS London Healthy Urban Development Unit	Noted.
T1/25	T1	Development of the OPDC area will have a major impact on traffic in the surrounding areas, in particular Harlesden Town Centre. An earlier	1	Not logged	No change proposed. OPDC is encouraging a modal shift to more sustainable transport modes and limiting car parking in order to reduce the congestion arising from

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		suggestion for a bypass road through the OPDC area would help alleviate this.			development at Old Oak and to deliver Healthy Streets.
T1/26	T1	Road congestion is the most pressing problem facing businesses in Park Royal, and would benefit from better maintenance.	1	Park Royal Business Group	No change proposed. OPDC recognise the present difficulties with congestion and available parking in Park Royal. The policies in the Local Plan seek to improve streets so that they relieve congestion and better support business.
T1/27	T1	Consideration of new transport strategies for the area should include rapidly emerging technology.	1	Park Royal Business Group	Noted. T1 g) outlines the promotion of effective and integrated management of streets to futureproof technological changes.
T1/28	T1	Support the delivery of Healthy Streets approach, but suggest Active Design checklist is used by applicants instead of the Healthy Streets checklist.	1	Sport England	No change proposed. Whilst OPDC acknowledge the benefits of Active Design, the impact of Healthy Streets checklist is more widespread and inclusive. The design chapter deals with supporting active lifestyles, as does policy SP3.
T1/29	T1	no solution to transport pinch-point at North Pole Road/Wood Lane	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. The Junction of North Pole Road / Wood Lane is not within OPDC area, however OPDC will work proactively with Hammersmith and Fulham when working on highway solutions.
T1/30	T1	TfL suggests that this should read 'minimise and mitigate the impact...'	1	Transport for London (Group Planning)	Change proposed- text suggestion has been incorporated.
T1/31	T1	Note that Healthy Streets Check tool is still undergoing	1	Transport for London (Group Planning)	Change proposed the TfL Streets Toolkit has also been referenced.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development - TfL Streets Toolkit should also be used.			
T1/32	T1	Upgrades to main access junctions into the area are required at the beginning of the project.	1	West Twyford Residents Association	No change proposed. The A40 study is a supporting study for the Local Plan and identifies improvements to Hanger Lane, Gypsy Corner and Savoy Circus access junctions. These junction improvements are included in OPDC's Infrastructure Delivery Plan.
T1/33	T1	The Local Plan plan requires a detailed breakdown of street types including minimum street widths, signage, cycleways and footpath widths.	1	West Twyford Residents Association	No change proposed. The key new proposed connections are detailed in the figure accompanying Policy SP7. The walking, cycling, bus and rail networks are provided within the transport chapter. Adoptable roads will need to built to specific standards which includes identification of streetwidths and road safety measures.

Policy T2: Walking

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/1	T2	Pedestrians should be required to share space with other road users unless speeds and vehicle numbers are very low.	1	Brent Cyclists	No change proposed. The Healthy Streets approach and sustainable transport hierarchy will be used to inform the design of streets and allocation of space to different modes.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/2	T2	Emphasis on walking shows lack of consideration for the elderly.	1	Friary Park Preservation Group	No change proposed. The Healthy Streets approach outlines several key points to address pedestrians, including providing adequate places to rest, safer environments and compliant gradients.
T2/3	T2	Segregate pedestrians from all other forms of transport.	13	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 OPDC Sustainable Hierarchy provides pedestrians with the highest modal priority. OPDC is committed to supporting the delivery of a high quality and safe pedestrian environment which could include segregation of different forms of transport.
T2/4	T2	Apply concept of lifetime neighbourhoods	13	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 SP2 references the need to support the delivery of lifetime neighbourhoods. This does not need repeating in Policy T2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/5	T2	Connections to surrounding areas is important	13	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. The Local Plan demonstrates the importance of connecting into surrounding areas.
T2/6	T2	Walking is important and walking infrastructure should not be reliant on development proposals.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will be exploring other ways to deliver walking infrastructure, as identified in Policy D11, such as working with service providers and bidding for funding.
T2/7	T2	Foot paths should be wide	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. OPDC outlines within T1 and T2 that walking infrastructure should be safe and accessible. All minimum standards for road and pavement width should be met or exceeded.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T2/8	T2	Green routes should be provided	13	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. Along with T2, EU1 and EU2 expand on urban greening and providing green routes through the OPDC area and beyond.
T2/9	T2	Lighting of walking routes	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will ensure that routes are well lit, but in conformity with light pollution limits. This would also be identified in the Healthy Streets Indicators.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/10	T2	Walking infrastructure map should show the A40 and A406 as walking routes	13	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 walking figure has been updated to show the walking network.
T2/11	T2	"High quality walking environment" should be further defined.	1	London Borough of Ealing	No change proposed. A 'high quality walking environment' is a reflection of the 10 Healthy Street Indicators and will follow the concepts of this.
T2/12	T2	Should clarify that this is "strategic walking network" and not comprehensive.	1	Transport for London (Group Planning)	No change proposed. The policy outlines OPDC's strategic approach to improving walking infrastructure across development sites. The aspirations set out in this policy are appropriate to support the delivery of high quality infrastructure.
T2/13	T2	Walking should be encouraged through improved public transport, public realm and car share facilities.	1	West Twyford Residents Association	No change proposed. All three of these points are proposed within the Local Plan to encourage walking along with a range of additional measures.

Policy T3: Cycling

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T3/1	T3	Greater clarify required on if/how site gradients can be mitigated to make movement easier for cyclists.	1	Brent Cyclists	No change proposed. As indicated in the supporting text to T1, all streets should have a gradient of at least 1:20 to be considered DDA compliant.
T3/2	T3	Do support use of "quietway" and "superhighway" terms for routes.	1	Brent Cyclists	Noted.
T3/3	T3	Proposed cycle network will not achieve connected network or routes, and "quieter routes" reference for all new routes is not appropriate.	1	Brent Cyclists	Change proposed. Reference to quietway and superhighway routes has been removed to ensure it doesn't appear that they are the only routes being developed. OPDC believes the cycle network proposed provides comprehensive cycle coverage for cyclists within the OPDC area and to networks outside of it.
T3/4	T3	Support aim to increase cycling to Park Royal.	1	Brent Cyclists	Noted.
T3/5	T3	London Cycling Design Standards are only cited with respect to cycle parking, but should be applied to all cycle infrastructure.	1	Brent Cyclists	Change proposed. LCDS is now referenced as being applicable to guide all aspects of cycle provision in the OPDC area.
T3/6	T3	Statement that infrastructure should meet LCDS design standards should be included in the Local Plan.	1	Brent Cyclists	Change proposed. LCDS is now referenced as being applicable to guide all aspects of cycle provision in the OPDC area.
T3/7	T3	A statement that infrastructure should meet LCDs design standards for gradient, surface	1	Brent Cyclists	Change proposed. LCDS is now referenced as being applicable to guide all aspects of cycle provision in the OPDC area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		quality and cater for all types of users should be included			
T3/8	T3	Emphasis on cycling shows lack of consideration for the elderly.	1	Friary Park Preservation Group	No change proposed. Walking and sustainable modes of travel are promoted within the transport policies. Quietways and less busy cycle routes are also identified for more vulnerable road users.
T3/9	T3	Lack clarity for integrating OPDC's cycle network with surrounding areas, the borough's and TfL's proposals.	13	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. Fig. 7.7 outlines routes outside of the OPDC area which existing and proposed cycle routes will feed into.
T3/10	T3	Alternative cycle routes to current busy routes should be provided.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Fig. 7.7 identifies a range of routes for cyclists to ensure comprehensive coverage and a range of routes for cyclists within the OPDC area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
T3/11	T3	Cycle paths should be wide	13	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. The LCDS will be used to guide all areas of cycling provision including the appropriate widths of cycle paths.
T3/12	T3	Policy will not radically change low take up of cycling in Park Royal	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believes the combination of infrastructure improvements, business behaviour change programmes and cycle hire schemes will encourage the uptake of cycling.
T3/13	T3	Cycling should be segregated from walking	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T3/14	T3	Support segregation of cyclists and pedestrians	13	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 LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.
T3/15	T3	Need cycle segregation	13	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. Segregated cycle networks will be proposed where appropriate.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
T3/16	T3	Need a cycle route next to the Chiltern Line	13	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. This would be very challenging to deliver. OPDC has investigated alternative east-west cycle routes, shown in the cycling figure.
T3/17	T3	Policy should ensure adequate secure cycle parking at all destinations.	1	London Borough of Ealing	No change proposed. Policy T3 is in line with the LCDS guidance and T3 e) states that all cycle parking should be secure, convenient and well located.
T3/18	T3	Should include strong requirement for investment in cycling infrastructure, and expand requirement for training to employers.	1	London Borough of Ealing	No change proposed. Behaviour change programmes are encouraged as part of the Infrastructure Delivery Plan.
T3/19	T3	Cycling parking should be covered by CCTV	1	London Borough of Ealing	No change proposed. T3 states that all cycle parking should be secure, convenient and well located.
T3/20	T3	Cycle parking should split across all floors and not just focused at ground level.	1	London Borough of Ealing	No change proposed. T3 encourages developers to plan cycle parking in line with the LCDS

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T3/21	T3	Text should be updated to consider dockless cycle hire.	1	London Borough of Ealing	No change proposed. Dockless hire is covered within "the provision of cycle hire...including from independent providers" T3 f).
T3/22	T3	Supports the provision of comprehensive cycling routes and networks across the OPDC area.	1	London Borough of Hammersmith and Fulham	Noted.
T3/23	T3	The Mayor supports the proposed requirement for cycle parking facilities.	1	Mayor of London	Noted.
T3/24	T3	Support policies for delivery of comprehensive cycle network and end of journey cycle facilities.	1	Park Royal Business Group	Noted.
T3/25	T3	Should come up with a completely revised cycling network and replace figure 7.7.	1	Regents Network	No change proposed. The cycling network presented in the cycling figure provides comprehensive coverage for cyclists and is evidenced by the walking, cycling and public realm study. Aspects such as cycle segregation will be developed as the road network design is progressed.
T3/26	T3	Walking and cycling should be considered as one. The Walking and cycling strategy published alongside the Local Plan does not address how a quietway could work on the Grand Union Canal.	1	Regents Network	No change proposed. Walking and cycling have been considered as one, evidenced by the production of the Walking and Cycling Strategy. The Quietway proposed is an improvement to an existing walking/cycling route along the towpath.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T3/27	T3	The wording in part a) is potential confusing. The wording should be amended to clarify requirements.	1	Transport for London (Group Planning)	Change proposed. OPDC has amended the wording to clarify requirements.
T3/28	T3	Support requirement for cycle parking facilities.	1	Transport for London (Group Planning)	Noted.
T3/29	T3	Wording should be amended to ensure independent cycle hire operations are complementary to TfL Cycle Hire.	1	Transport for London (Group Planning)	No change proposed. OPDC considers that the wording is sufficient to support both TfL Cycle Hire and independent cycle hire operations.
T3/30	T3	Map should also show aspirational improvements for cycle routes, and include the now confirmed Wood Lane to Acton cycle superhighway route.	1	Transport for London (Group Planning)	Change proposed. This now includes aspirational cycle improvements and the cycle superhighway route
T3/31	T3	Cyclists should have dedicated cycle lanes on opposite sides of the road.	1	West Twyford Residents Association	No change proposed. The principles of LCDS will be applied to cycle schemes, which incorporate a number of approaches to segregating cycle traffic from motorised vehicle movement

Policy T4: Parking

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T4/1	T4	Need to recognise parking need for servicing and deliveries	1	ArtWest	No change proposed. Policies SP7, T4 and T7 note the importance of servicing needs
T4/2	T4	Car parking limits are not appropriate in the context of industrial development. Some flexibility is required for commercial car parking.	1	CBRE	No change proposed. Policy T4 indicates that commercial parking in Park Royal will be assessed on a case by case basis. Strong justification for parking will need to be demonstrated by developers.
T4/3	T4	Principle of car free development is supported, but application needs to be considered against practical challenges in extending footpaths to 151 Scrubs Lane.	1	CBRE	Noted. Detail regarding developments will be considered on a case by case basis.
T4/4	T4	0.2 spaces per unit policy will be important in mitigating traffic congestion in the surrounding area.	1	David Craine	Noted.
T4/5	T4	There seems a lack of parking.	1	Friary Park Preservation Group	No change proposed. OPDC is limiting parking to a maximum of 0.2 spaces for residential and zero for non-residential (excluding disabled parking) unless business needs justify otherwise. This is to reduce congestion and encourage a shift to more sustainable modes.
T4/6	T4	Car dependency and congestion in Park Royal cannot be tackled only through controlled parking.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Controlled parking is not the only way OPDC plans to tackle congestion. Modal shift to more sustainable modes is also important, using new technologies and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	encouraging Car Free development. This is indicated in the transport chapter, SP7 and the Infrastructure Delivery Plan.
T4/7	T4	There is no certainty of implementation given that OPDC is not the highway authority.	13	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. OPDC will continue to work closely with the three highway authorities to ensure policies within this plan are realised.
T4/8	T4	Parking and loading should be on site.	13	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,	No change proposed. Policy T7 outlines that developments should provide off street servicing, where possible.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	
T4/9	T4	Provision of only 0.2 spaces per new home is very challenging, and may affect successful marketing of housing developments. The OPDC should publish evidence on existing similarly scaled schemes that successfully function with such very low parking standards.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC undertook a Car parking study which is provided as a supporting study to this local plan. The purpose of the study was to provide a critical review of the proposed parking policy in the Local Plan from a market and viability perspective, including a desktop study of precedents. This concluded that 0.2 spaces per residential unit was appropriate.
T4/10	T4	CPZs should target all day parking.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will work with the local highway authorities to investigate, consult on and implement CPZs.
T4/11	T4	Do not support proposals of West London Line Group for constructing over Little Wormwood Scrubs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T4/12	T4, SP5	Alternatives to car use in SIL should be encouraged and provided, and new development in SIL should be car-free.	1	John Cox	No change proposed. This is required through Policy T4, but it recognises that for non-residential development in SIL, this will be challenging and that the appropriate level of car parking should be considered on a case by case basis.
T4/13	T4	There is no policy on blue badge/disabled parking.	1	London Borough of Ealing	No change proposed. Policy T4 requires developers to "securing appropriate blue badge provision for both residential and non residential uses"
T4/14	T4	Potential for parking levies in OPDC should be explored.	1	London Borough of Ealing	No change proposed. OPDC will continue to work with stakeholders to explore the use of tools to reduce private car parking.
T4/15	T4	Car club bays should be 100% electric vehicles	1	London Borough of Ealing	No change proposed. The policy text states that car club bays should be adapted to look at different uses in the future. This includes electric points.
T4/16	T4	All lamp columns should be front of kerb and allow cable charging from the columns	1	London Borough of Ealing	No change proposed. This matter is considered too detailed for inclusion in the Local Plan.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T4/17	T4	Generic terms should be used in stead of Source London.	1	London Borough of Ealing	Change proposed. The Source London reference has been removed.
T4/18	T4	Text should be reordered.	1	London Borough of Ealing	Change proposed. The text has been reordered in line with suggestion.
T4/19	T4	Not clear whether there will there be adequate provision for electric vehicle charging and disabled parking. The Council supports the car provision standards but is keen to ensure there is adequate public transport provision.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC intends to require all parking spaces to have either passive or active provision at a ratio of 80:20. Appropriate blue badge parking will be required for all residential and non residential uses.
T4/20	T4	The Mayor supports approach to car parking and encouraging car free development.	1	Mayor of London	Noted.
T4/21	T4	Support delivery of car club bays and charging points.	1	Park Royal Business Group	Noted.
T4/22	T4	Support overall approach of limiting car parking, and development proposing car parking should provide a Parking Design and Management Plan.	1	Transport for London (Group Planning)	No change proposed. The requirement for a Parking Design and Management Plan would be something that is incorporated into any Delivery and Servicing Plan or Design and Access Statement.
T4/23	T4	Approach to promoting modal shift is welcome, and be referenced in strategic policies.	1	Transport for London (Group Planning)	No Change proposed. This is already explained within SP7.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T4/24	T4	Support policy for provision of electric car parking spaces.	1	Transport for London (Group Planning)	Noted.
T4/25	T4	Amend text to include reference to TfL.	1	Transport for London (Group Planning)	Change proposed. OPDC has amended the text to include TfL.
T4/26	T4	TfL sees the OPDC area as a potential location for a new coach facility and would like to work with OPDC to investigate further.	1	Transport for London (Group Planning)	No change proposed. OPDC will work with TfL to investigate this potential. However, OPDC does not consider it appropriate to allocate land for a coach station at this time as feasibility work is underway exploring other locations across London. Coach parking requirements are dealt with in the round in Policy T4.
T4/27	T4	Parking needs to be accessible to discourage the current congestion issues.	1	West Twyford Residents Association	No Change. Congestion is being addressed by reducing car dependency. This is achieved by capping car ownership and developing car sharing schemes to restrict the on-street demand for long-stay and short-stay parking. OPDC is limiting parking to a maximum of 0.2 spaces for residential and zero for non-residential (excluding disabled parking) unless business needs justify otherwise. This is to reduce congestion and encourage a shift to more sustainable modes.

Policy T5: Rail

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/1	T5	Need to ensure taxis and cars dropping off at stations do not impact on cycling infrastructure	1	Brent Cyclists	Noted. OPDC will work with TfL, Network Rail, HS2 Ltd and the local authorities to ensure there are adequate facilities for taxi ranking and that these do not impede cyclists. Private vehicle drop offs are strongly discouraged as detailed in Policy T5.
T5/2	T5	Strongly support rail proposals, and suggest considering opening West Coast Main Line platform at Willesden Junction.	1	David Craine	Noted.
T5/3	T5	Lack of committed funding for HS2 is a problem.	1	Friary Park Preservation Group	No change proposed. HS2 Ltd now has royal assent so has committed funding
T5/4	T5	This policy is not effective. Focusing Old Oak development on the HS2 Station as a destination is not good place-making; it is simply one component of the area. In particular policy clauses e) & h) have consequences for and pre-empt proper place-making and lack clarity on the implications for the design solutions for stations. Old Oak Common Station and its context should not be predetermined by clause h).	13	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. This policy does not solely focus on the HS2 station. OPDC does not consider that points e) and h) would compromise place-making. In addition to applying these policies, all other relevant policies in the Local Plan, other development plan documents and other material planning considerations would need to be considered in forming a view on the acceptability of a proposal.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/5	T5	Policy should be more specific about how effective interchange in stations will be achieved and should reference particular stations where this will be sought.	13	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 exact way in which interchange will be achieved will need to be considered on a case by case basis and assessed against all relevant planning policy and material considerations. Specific stations are dealt with in the places chapter.
T5/6	T5	Protect the potential for Willesden Junction to have a greater local/west London role with more platforms.	13	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 policy supports the potential delivery of new platforms on the West Coast Main Line. Additional platforms on other lines would be a considerably challenging and is not currently proposed by either Network Rail or TfL, so it is not appropriate for the Local Plan to safeguard for the provision of this.
T5/7	T5	This policy, and indeed the Old Oak South proposals, lack flexibility, given that the strategic transport hub, which as explained in Policy SP1 forms the 'catalyst for growth',	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. OPDC is working closely with DfT and HS2 Ltd to ensure the station proposals meet the aspirations indicated within the Local Plan. Requirements associated with Old Oak Common station are dealt with in Policy P1C1.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		is dependent on a project largely beyond the ability of the OPDC to control.		Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T5/8	T5	Old Oak Common Station should be recognised for what it is, an interchange, and, therefore, its primary function and facilities should be to provide for convenient train to train changes by travellers, and to cater for commuters, residents and visitors to Old Oak.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believes the Local Plan makes it clear that the station is an important interchange providing access to travellers and catering for commuters, residents and visitors.
T5/9	T5	Vehicular access to the station will be restricted by local traffic	13	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 station will be primarily served by buses, taxis, cyclists and pedestrians with a limited kiss-and-ride facility currently proposed. OPDC hopes that the highest share of people using the station will travel by sustainable modes: pedestrians, cyclists and buses and is working positively with DfT, HS2 Ltd and TfL to achieve this.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/10	T5	Station improvements are dependent on development proposals. North Acton needs upgrading now.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is working with TfL and LB Ealing to develop the proposals for North Acton station. The North Acton station study identified shorter term proposals. This study is a supporting study to the Local Plan. Requirements for North Acton station are dealt with in Policy P7 and P7C1.
T5/11	T5	The relationship of railways with new or more frequent services with neighbouring properties should be carefully considered and any unavoidable adverse environmental impact should be remedied.	13	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. OPDC will work with delivery bodies of stations, such as TfL, and work to ensure the interaction with neighbouring properties is carefully considered. Proposals would need to accord with all relevant planning policy, which includes giving consideration to amenity issues such as noise, vibration and visual impact.
T5/12	T5	Policy should not focus on Old Oak Common Station as the primary destination in the area.	1	John Cox	No change proposed. The policies are equally balanced in reference to existing and new stations.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/13	T5	There is a need to relate new stations to the services and destinations that they serve.	1	John Cox	No change proposed. The figure shows the destinations served by lines in the area. Decisions over services and destinations served by railways are made by the relevant rail authority.
T5/14	T5	Proposed new stations and station upgrades should be specifically referenced to ensure delivery.	1	John Cox	No change proposed. The spatial elements of station improvements are covered in the place policies.
T5/15	T5	There is a need to protect existing operational railway land.	1	John Cox	No change proposed. Operational railway land benefits from protection outside of the planning regime, where it warrants appropriate protection. OPDC will engage with Network Rail and other relevant rail bodies to understand these operational requirements
T5/16	T5	Fully support policy to ensure routes and spaces within stations are integral parts of local street frontage.	1	London Borough of Ealing	Noted.
T5/17	T5	Typo. Pioneer misspelt.	1	London Borough of Hammersmith and Fulham	Change proposed.
T5/18	T5, para 7.37	Typo. 'Include' should be replaced with 'are'.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the current wording to be appropriate.
T5/19	T5	Proposed overground station at Hythe Road and Old Oak Common Lane should be referred to as "potential" new	1	Mayor of London	Change proposed to ensure stations are referred to as potential

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		stations throughout the document.			
T5/20	T5	Joint work is ongoing to examine upgrades are needed at existing stations and rail services.	1	Mayor of London	Noted.
T5/21	T5	Any long term plans for redevelopment affecting operational rail facilities will need to take account of future operational need.	1	Mayor of London	Noted.
T5/22	T5	The rail policy does not set out where stations are proposed or provide a strategic context for rail. Reference should be made to Kensal Canalside station and to an additional Overground station at Westway Circus	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The rail figure indicates the rail connections and stations that will be available to serve the development area. This has been changed to show existing and potential rail stations and services. Figure 7.14 shows the bus network which will serve the area.
T5/23	T5	Show potential Kensal Canalside Elizabeth Line Station	1	Royal Borough of Kensington and Chelsea	No change proposed. The station is outside of the OPDC area is not yet committed so it is not appropriate to include this within OPDC's Local Plan. Reference is made to the potential for a station in the supporting text to policy SP1.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/24	T5	Should clarify what rail and bus service improvements were assumed when assessing future PTALs.	1	Transport for London (Group Planning)	No change proposed. The Local Plan indicates that the figure shows potential future PTAL levels in the OPDC area when all of the transport infrastructure detailed within the local plan has been delivered."
T5/25	T5	Clarification text required on potential new stations and station improvement works indicating that the business case and capacity study is still outstanding	1	Transport for London (Group Planning)	No change proposed. OPDC has indicated the stations are potential. If the outcome of the business work changes this will be amended.
T5/26	T5	Annotation should make a distinction between existing and potential/future rail infrastructure.	1	Transport for London (Group Planning)	Change proposed. The figure has been amended to show existing and future rail infrastructure
T5/27	T5	Elizabeth Line spur is not a TfL priority and should not be included in the Local Plan	1	Transport for London (Group Planning)	Change proposed. This has been removed from the rail policy.
T5/28	T5	References to "station squares" should be amended to allow greater flexibility in the design of these spaces.	2	Transport for London (Group Planning) and Mayor of London	Change proposed. Text has been amended to say station squares and public realm
T5/29	T5	Concerns that making development car free will penalise elderly, disabled and larger families.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Car free development will be supported with high quality walking and cycling environments and a coherent and comprehensive bus network to ensure the transport network in Old Oak and Park Royal is accessible to all.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T5/30	T5	Support the policy	1	West London Line Group	Noted. No change proposed.
T5/31	T5	Refer to GTR/Southern East Croydon – Milton Keynes service Refer to HS2-WLL link and raft Refer to Westway Circus Overground Station	1	West London Line Group	No change proposed. The Westway Circus Overground station is not within the OPDC boundary. The other proposals are not committed or supported by relevant transport bodies.
T5/32	T5	Agree with submission of West London Line Group, and add that connectivity between different stations doesn't look good.	1	West Twyford Residents Association	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan
T5/33	T5	Concern that Crossrail may not have capacity to accommodate passenger numbers at Old Oak Common Station.	1	West Twyford Residents Association	No change proposed. OPDC will work with HS2 Ltd and DfT to ensure the station meets the aspirations set out in the Local Plan.

Policy T6: Buses

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T6/1	T6	Lack of information on new bus routes.	1	Friary Park Preservation Group	No change proposed. The Bus Strategy supporting study indicates how buses would serve Old Oak and Park Royal is provided as a supporting study to the local plan.
T6/2	T6	This policy is not effective. It is inadequate to proactively support bus development in a planned and coherent way, on a road network that should facilitate optimum routing, particularly between Park Royal and Old Oak/HS2 Station. This should be made explicit in policy. It is dependent on individual developments coming forward, and this is reflected in the likely indeterminate consequences arising from clause c).	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believes the policies are effective to promote the delivery of a coordinated and coherent bus network.
T6/3	T6	Bus stop locations should be coordinated with station interchanges	13	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. Bus stops will be provided at regular intervals to ensure the network is comprehensive and accessible to all. This includes adequate bus stops at station interchanges so that passengers have a seamless journey from rail to bus.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T6/4	T6	Bus services serving the wider area from Old Oak and Park Royal need investigating.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has worked closely with TfL to understand the requirements of bus routes serving Old Oak and Park Royal. One of the pieces of information used is bus reliability data across the routes. This identifies where bus reliability is impacted outside the Old Oak and Park Royal boundary. OPDC will work with TfL and the London Boroughs to ensure routes serving Old Oak and Park Royal are operating reliably.
T6/5	T6	Figure 7.14 should show new bus routes and there are no routes shown to Old Oak Common station.	13	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. The figure shows existing routes and roads that may form part of a future bus network, subject to funding and consultation. This includes routes to the Old Oak Common station.
T6/6	T6	Paras 7.44 and 7.48 repeat themselves.	1	London Borough of Ealing	Change proposed. The text has been reduced to avoid duplication
T6/7	T6	This should acknowledge the need for segregated cycle lanes on bus corridors	1	London Borough of Ealing	No change proposed. The LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.
T6/8	T6, Para 7.44	Suggestion to delete 'more'	1	London Borough of Hammersmith and Fulham	Change proposed.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T6/9	T6, Para 7.49	"Green" bus provision paragraph needs to be stronger.	1	London Borough of Hammersmith and Fulham	Noted. No change proposed. OPDC considers the current paragraph to be strong enough and effective enough to support the roll out of green buses.
T6/10	T6	Long term plans for the bus network should be in line with OPDC Bus Strategy, and OPDC should work with TfL to help develop and interim phasing bus strategy.	1	Mayor of London	Noted. OPDC will liaise and work with TfL on future bus strategies. References to the bus strategy have been added to the supporting text.
T6/11	T6	Further study required to understand existing/potential employee bus users in Park Royal.	1	Park Royal Business Group	No change proposed. Work has been undertaken on this as part of the Park Royal Transport Study. OPDC considers the level of detail in this is sufficient for the Local Plan.
T6/12	T6	Show potential bus link to Ladbrooke Grove	1	Royal Borough of Kensington and Chelsea	Change proposed. The potential link to be shown in the bus map.
T6/13	T6	Section should state that plan for the future bus network in the area should be developed in line with Bus Strategy for OPDC.	1	Transport for London (Group Planning)	Change proposed. Reference to the bus strategy has been included. The bus network will need to be developed in a phased approach.
T6/14	T6	Policy T6a) should read 'facilitate, deliver and contribute to bus network and infrastructure, including ...'	1	Transport for London (Group Planning)	Change proposed. Policy text has been updated as per TfL's suggestion.
T6/15	T6	Bus lanes are required to support a strong bus network. Concerns that existing roads will not have enough road space.	1	West Twyford Residents Association	No change proposed. OPDC are committed to facilitating and delivering appropriate bus infrastructure, as set out in Policy T6 and in the Infrastructure Delivery Plan along with necessary road improvements if required.

Policy T7: Freight, Servicing and Deliveries

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T7/1	T7	Support policy.	1	ArtWest	Noted.
T7/2	T7	Part a) iii) of the draft Policy encourages the use of freight consolidation centres where appropriate. Request that the spatial coverage of the Policy is clarified. It is unclear where these centres might be located, how they are expected to be delivered, how they are intended to operate etc. More detail is required including relevant evidence	1	CBRE	No change proposed. The policy encourages developers to use freight consolidation centres where appropriate to reduce construction vehicle trips on the road network. Developers will need to demonstrate that they have investigated the potential to use freight consolidation centres to mitigate construction activity.
T7/3	T7	Support the reference to the last mile service. Suggest that the principle of last mile deliveries is given even greater support and visibility within the Plan, given that this is a core function of Park Royal, both locally and strategically.	1	CBRE	No change proposed. The text supports the use of last mile servicing. OPDC considers the level of support for this is appropriate within the plan. OPDC will work with businesses to understand how last mile deliveries could be implemented.
T7/4	T7	This policy is not effective. The policy should be more emphatic on planning for and the provision of consolidation centres to transfer loads to smaller 'last mile' vehicles with controls on access by HGVs; together with a	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Developers are required to show evidence within their Construction Logistic Plan of their investigations to reduce trips generated by their construction activity. This includes investigating the use of consolidation centres.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		proactive plan to improve Park Royal's transport and traffic operations.		Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T7/5	T7	Policy T7 d): substitute 'canal' for "water".	13	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. This policy relates to use of the Grand Union Canal.
T7/6	T7	The promotion of rail and canal for freight should be an integral part of this policy and rail links/heads and wharfs should be protected and enhanced.	13	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. This is covered within T7d: Maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water (to be changed to the canal), electric vehicles, cargo bikes and last mile deliveries by sustainable modes.
T7/7	T7	The Plan should positively plan for Park Royal to resolve, among other things, the transport issues, many of which are related to	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The Park Royal Transport Strategy identifies a range of transport interventions to mitigate traffic, servicing and environmental issues. These are

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		servicing and deliveries, but will not be dealt with through development proposals. A clear signpost in this policy, connected with Place Policies on Park Royal, should bring forward a management programme to resolve prevailing traffic, servicing and environmental issues.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	detailed in the Park Royal place policies and the IDP.
T7/8	T7	There should be a clear policy on loading specifying it is off street.	1	London Borough of Ealing	No change proposed, securing servicing that is off street is indicated in T7)b.
T7/9	T7	Support proposal for consolidation centres, but should require final delivery to be made using ULEVs.	1	London Borough of Ealing	No change proposed. T7 d) seeks to maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water, electric vehicles, cargo bikes and last mile deliveries by sustainable modes.
T7/10	T7	The Local Plan should support the potential delivery of a coach station to serve wider than local needs.	1	Transport for London (Commercial Development)	No change proposed. Policy T4 supports the provision of coach parking. A larger facility would need to be assessed against this and other relevant policies in the Local Plan.
T7/11	T7	Section should include good examples of construction best practice eg high quality hoarding/wayfinding, site manager contact information.	1	Transport for London (Group Planning)	No Change proposed. This is indicated within the supporting study.
T7/12	T7	OPDC should examine the New York freight lorry system, restricting access to the City after 6.00am	1	West Twyford Residents Association	No change proposed. OPDC requests that developers use the Construction Logistics Planning guidance produced by TfL. This includes a section about retiming deliveries to avoid the peak traffic periods. OPDC will work

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					with businesses, TfL and the local authorities to investigate the opportunities for minimising freight vehicle movements.

Policy T8: Construction

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T8/1	T8	Policy is sound (no justification provided)	1	Friary Park Preservation Group	Noted.
T8/2	T8	Promotion of use of rail and canal supported.	13	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.
T8/3	T8	Construction Logistics Plan/Code of Practice need to be monitored and periodically revisited (to ensure that they are fit for purpose over time). Reinstate FORS to gold standard.	13	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,	No change proposed. The Construction Logistics Plans will be monitored and revisited. TfL have indicated that FORS silver standard is the minimum standard construction companies should have to achieve.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T8/4	T8	Refer to VNEB as a precedent for modelling construction	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC does not consider it appropriate to reference this as a precedent as this work was undertaken to support the Opportunity Area Planning Framework, rather than being something undertaken by developers. OPDC has commissioned its own Construction and Logistics Strategy and tools from this will be made available on OPDC's website.
T8/5	T8	There should be meaningful and effective community involvement in the preparation of an OPDC/TfL's Construction Logistics Strategy and development CLP/CofPs.	13	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. Developers will be required to follow the recognised, best practice TfL guidance for the development of CLPs. The Construction and Logistics Strategy will investigate options for reducing vehicle movements generated by construction.
T8/6	T8	The Strategy, Plan and Code should include: the management of construction phasing so that particular areas are not building sites over	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. The strategy will be looking at the management of construction phasing to ensure construction activity is coordinated to minimise the impact. This is indicated in the supporting text of T8.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		prolonged periods of time and/or intensity		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T8/7	T8	Developments should follow Considerate Contractor Schemes; these should include good communication with the community to help minimise inconvenience;	13	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 supporting text highlights the requirement for developers to sign up to the considerate constructors scheme.
T8/8	T8	Should support prefabrication of buildings	13	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. The construction methodology for the developments will be detailed within the CLPs which will be reviewed by OPDC to ensure it is the most appropriate methodology. Advanced construction methods are supported in Policy SP2.
T8/9	T8	A development's Construction Logistics Plan and Construction	13	Grand Union Alliance, Wells House Road	Noted. OPDC requires developers to submit a CLP as part of the planning

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Code may be required to provide mitigation and prevention measures that extend beyond the actual construction site.		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	submission which will explore the impact of the construction activity and routings which will in some cases fall outside the boundary of the site.
T8/10	T8	Should use rail and canal for transportation of construction material	13	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 identify the need for developers to explore opportunities to transport construction material by rail or via the Grand Union Canal
T8/11	T8	Preferred routes for construction traffic should minimise impact on existing residents.	1	London Borough of Ealing	Noted. Developers will be required to provide forecast trip generation to OPDC so impacts on local residents can be minimised.
T8/12	T8	Wording should refer to Construction Logistic Plans (CLPs) to be consistent with TfL guidance.	1	Transport for London (Group Planning)	Change proposed. Text refers to CLPs and recommends that developers use this helpful guidance.
T8/13	T8	Holding areas required for construction projects.	1	West Twyford Residents Association	No change proposed. OPDC requests that developers use the Construction Logistics

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>Planning guidance produced by TfL. This includes advice regarding using lorry holding areas to reduce the propensity for construction vehicles to circle around on local roads waiting to unload or pick up construction materials. OPDC will work with developers, TfL and the local authorities to investigate the opportunities for minimising construction vehicle movements.</p>

8. Housing

Policy H1: Housing Supply

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/1	H1	Encourage the OPDC to work with partners to drive early delivery of new housing.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted. The Delivery and Implementation Chapter 11 details how as a proactive planning authority OPDC will work to ensure the timely delivery of new housing supply.
H1/2	H1	The annual homes target identified in the Plan is below that required in Annex 1 of the (2015) London Plan, but it is acknowledged that overall capacity identified in the London Plan will be exceeded in the longer term.	1	Greater London Authority	Change proposed. Policy H1 and the supporting text has been amended to clarify that OPDC is committed to supporting the delivery of the ten-year net housing delivery targets for the OPDC area, as set out in the most up-to-date London Plan.
H1/3	H1	TfL has requested that references to the Elizabeth line depot site coming forward for development during the Local Plan period be removed as any redevelopment proposals will only come forward in the longer term and will still be required to provide for operational purposes. The removal of this site will not affect OPDC's ability to deliver its housing numbers within the short term (0-10 years) as this site has been	1	Greater London Authority	Change proposed. The Elizabeth Line depot is no longer identified as coming forward within the Local Plan period.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		identified in the London SHLAA as delivering homes in 10-20 years and is proposed for mainly commercial rather than residential development.			
H1/4	H1	Supports the level of housing proposed as it is positively prepared and justified based on proportionate evidence. The additional housing within the OPDC boundary will help meet the needs of the wider immediate area and across London.	1	Royal Borough of Kensington and Chelsea	Noted.
H1/5	H1	The host borough should receive 100% of the affordable housing nominations for homes in its boundaries.	1	London Borough of Hammersmith and Fulham	No change proposed. This is not an issue for the Local Plan. OPDC has agreed an affordable housing nominations policy with the London Boroughs of Brent, Ealing and Hammersmith & Fulham.
H1/6	H1	No information provided on funding for new homes.	1	Friary Park Preservation Group	No change proposed. Actual affordable housing delivered through planning applications will need to be carefully balanced between infrastructure requirements, the overall amount of affordable housing and the availability of grant funding OPDC will work with developers, Registered Providers and the GLA to secure funding for new affordable homes and also funding for infrastructure.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/7	H1	The target for 24,000 homes has not been "objectively assessed".	19	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, Midland Terrace Residents, Nye Jones, Nicky Guymmer, Bruce Stevenson, Dave Turner, Mark Walker of TITRA, Oonagh Heron	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). The Development Capacity Study identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red line boundary will be met in full. However, the development will also help to meet wider housing needs in the London Boroughs of Brent, Ealing and Hammersmith & Fulham and strategic London-wide housing need. The Development Capacity Study (DCS) fulfils the role of a Housing and Economic Land

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Availability Assessment and officers are satisfied that this has been completed in accordance with PPG. The DCS has identified sites and broad locations and assessed their development potential as is required under the NPPF.
H1/8	H1	The impact of Brexit on migration should be inform a revision of housing needs figures.	12	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. At the time of writing, formal negotiations regarding Britain's future relationship with the EU have yet to reach agreement on the rules governing the movement of people between Britain and countries within the EU, as well as the rights of British and EU citizens already living abroad. The outcome of these negotiations has the potential to dramatically influence future patterns of migration. It is possible to explore some hypothetical scenarios for the country as a whole, assuming a range of future migration flows between the UK and Europe, but the uncertainties are far greater when considering the impact on individual regions or local authorities. As well as uncertainty about the overall level of international migration, there are further questions about how the distribution of those migration flows between UK regions might change and what the knock-on effects on domestic migration might be. At the current time, it therefore does not seem appropriate to attempt to attempt to explicitly account for

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the referendum result in the projections. The value of making speculative assumptions about the final outcome and its repercussions seems limited. More valuable is to ensure that the underlying assumptions for the projections are transparent so that they provide a suitable basis for additional analysis. This is something that will be drawn out in future versions of the Local Plan.
H1/9	H1	OPDC should explore the concepts of self build housing in industrial areas.	12	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 H1 commits OPDC to support applications for self-build and custom build where these accord with other Local Plan policies. Responsibility under the Self-Build and Custom Housebuilding Act does not fall to Mayoral Development Corporations. However, OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to ensure that the area is meeting the need of people registering a wish to build their own home. Residential development is not a SIL compliant use.
H1/10	H1	There has been no assessment of whether the area's roads and infrastructure can cope with large-scale regeneration.	17	Nicky Guymer, Bruce Stevenson, Dave Turner, Mark Walker of TITRA, Oonagh Heron, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. The Old Oak Strategic Transport Strategy and the Park Royal Transport Strategy tested the impact of development on the highway and public transport network. It identifies a significant number of infrastructure requirements to support the regeneration of the core development area in Old Oak and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	requirements for Park Royal. The Infrastructure Delivery Plan (IDP) also forms part of the evidence base for the Local Plan and includes the interventions identified in the strategies. The IDP identifies the key pieces of infrastructure which OPDC would look to secure through developer contributions (Section 106, Section 278 or Community Infrastructure Levy).
H1/11	H1	Support opportunities to build new social housing on publicly owned land and options to deter foreign and buy-to-let investment.	13	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.
H1/12	H1	The housing supply policy is not positively prepared or justified. Question both the overall provision and the effect on the quality of housing that will be produced to achieve those targets.	14	Hammersmith Society, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. Old Oak and Park Royal are identified as Opportunity Areas with the capacity to deliver 25,500 homes, Opportunity Areas are the capital's most significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. The housing targets in OPDC's

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>Local Plan are based on the Development Capacity Study which identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red line boundary will be met in full. However, in accordance with London Plan policy as Opportunity Areas Old Oak and Park Royal will also help to meet wider housing needs in the London Boroughs of Brent, Ealing and Hammersmith & Fulham and strategic London-wide housing need.</p>

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/13	H1, para 8.13	The requirement to market homes to Londoners is not effective as the policy and supporting text do not set out how this will be achieved.	14	Hammersmith Society, Old Oak Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. As set out in H1, OPDC will work with the GLA and developers to ensure that wherever possible homes are marketed to and occupied by people who live and work in London. As set out in the draft London Housing Strategy and draft London Plan 2017, the Mayor of London aims to ensure that Londoners have an opportunity to purchase new homes before they are marketed overseas – particularly those homes that ordinary Londoners are more likely to be able to afford. The Mayor is discussing with major homebuilders steps to make more new homes available to Londoners before anyone else. OPDC will work with the Mayor to implement this.
H1/14	H1, para 8.14	Support policy to monitor housing delivery.	13	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.
H1/15	H1	Alternatives should have been explored for the appropriate housing market	13	Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The Local Plan has is required to be in general conformity with the London Plan. This sets out that Old Oak and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		area. The London Plan homes target for Old Oak should not be used as justification for OPDC's target.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Old Oak Interim Neighbourhood Forum	Park Royal are Opportunity Areas and that Opportunity Areas are key engines for growth in the city. OPDC has undertaken a Development Capacity Study in accordance with Planning Practice Guidance which has identified sites and broad locations and assessed their development potential as is required under the NPPF. OPDC has also undertaken a Strategic Housing Market Assessment to identify the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary in accordance with the NPPF. Based on this approach, and the area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). Recognising the value of the Opportunity areas to contribute towards meeting wider need, OPDC can also help meet housing needs in the London Boroughs of Brent, Ealing and Hammersmith & Fulham and also help meet city-wide need.
H1/16	H1	The Plan should have a policy for self-build and custom build and identification of sites.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Policy H1 commits OPDC to support applications for self-build and custom build where these accord with other Local Plan policies. The responsibility to plan for the needs of people who want to build their home does not fall to MDC's. However, OPDC will work with local

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	authorities to ensure that the area is meeting the needs of people who wish to build their own home.
H1/17	H1	Policy is not justified because it makes ambitious assumptions about the speed of market housing absorption.	14	Harlesden Lets, 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. As set out in the Market Absorption Study the delivery rates in other large regeneration schemes have been assessed. Given the scale of the site, the research concludes that there are multiple markets within Old Oak and Park Royal and therefore promotes an average delivery rate of up to 700 private homes a year. The research also finds that homes for rent (affordable and market) do not compete with private homes for sale as they are targeted at different markets and can increase the overall number of homes delivered on the site.
H1/18	H1	The reference to 'windfall housing' sites should be extended to take a serious look at the potential development on small sites, including above retail premises.	1	Harlesden Lets	No change proposed. OPDC will work with developers to identify windfall sites in the area for delivery of housing. The draft London Plan 2017 provides OPDC with a target to deliver 60 homes a year in this way over the next 10 years.
H1/19	H1	Should be a policy on bespoke housing solutions to maximise the use of difficult sites.	1	Harlesden Lets	No change proposed. It is not clear what bespoke housing solutions merit an additional policy in the Local Plan.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/20	H1	Arrangements should be made to provide additional housing in Harlesden.	1	Harlesden Lets	No change proposed. Most of Harlesden lies just outside of OPDC's boundaries. However, OPDC will work with Brent Council and Harlesden Neighbourhood Forum, to provide homes within the red-line boundary to meet housing needs in Harlesden.
H1/21	H1	Concern that the reduced number of homes on the Old Oak Park development will be directed to other sites by OPDC to achieve its housing target.	14	Midland Terrace Residents, 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 development capacity of sites within the Old Oak Park area is defined using the methodology set out in OPDC's Development Capacity Study which is defined in the National Planning Practice Guidance. This considers relevant existing development scheme precedents to inform density levels and therefore capacity. As such, the capacity for sites in the Old Oak Park area within OPDC's DCS and Local Plan are not reliant on capacity shown in the emerging Old Oak Park proposals.

Policy H2: Affordable Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H2/1	H2	Concerns about the affordability of intermediate housing products and whether they will be affordable to local people.	17	London Borough of Hammersmith and Fulham, Harlesden Neighbourhood Forum; Harlesden Lets, Grand Union Alliance, Robert	No change proposed. OPDC has set the policy in accordance with the Mayor of London's preferred tenures as set out in the Affordable Housing & Viability SPG and Draft London Plan 2017. London Living Rent and Shared Ownership are the Mayor of London's

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Cowell, 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	preferred intermediate housing products and meet the requirements in the National Planning Policy Framework and income limits in the draft London Plan. Policy H2 sets an additional safeguard that units must be provided that are affordable to households on average incomes in the local authority area.
H2/2	H2	The tenure split in Policy H2 does not reflect objectively assessed need as identified in the OPDC SHMA which forecasts a 86% need for London Affordable Rent. The proposed tenure split should be changed to 60% London Affordable Rent and 40% Intermediate housing (including London Living Rent and London Shared Ownership) to accord with current London Plan Policy 3.11 .	20	Brent Council, Ealing Council, Hammersmith & Fulham Council, Harlesden Neighbourhood Forum; Harlesden Lets, Old Oak Interim Neighbourhood Forum, Grand Union Alliance, Crisis Brent, 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 current London Plan contains an affordable housing target split of 60% social/ affordable rent and 40% Intermediate housing; subject to viability, local housing needs and promoting mixed and balanced communities. However, the draft London Plan 2017 contains a target split as follows: 30% low cost rented homes (social rent); 30% intermediate products (London Living Rent and Shared Ownership); and 40% to be determined by the local planning authority (LPA) based on identified need, provided they are consistent with the definition of affordable housing in the NPPF. The proposed tenure split is considered to be positively prepared; justified; effective; and consistent with London and national policy on the following grounds. The NPPF states that LPAs should set out the strategic priorities for their area which should include strategic

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>policies to deliver (amongst others) "the homes and jobs needed in the area". In accordance with the NPPF and existing planning guidance based on a current population of 7,000 people and 2,800 households, the SHMA identifies an objectively assessed need (OAN) for 1,200 new homes over the Local Plan period (2018 to 2038). The SHMA has identified an 86% need for London Affordable Rent. Whilst the policy is not directly corresponding in percentage terms, the OAN in terms of tenure split will likely be achieved due to over delivery of housing above the OAN as demonstrated by the Development Capacity Study (2017); which demonstrates that 20,000 homes can be delivered in the local area during the Local Plan period to help meet a wider need across the London Boroughs of Brent, Ealing and Hammersmith & Fulham. The draft London Plan 2017 sets a strategic target that 50% of all new homes in London should be affordable. An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30%</p>

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					London Affordable Rent/70% Intermediate. This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. As such, reasonable alternatives to the chosen affordable housing tenure split have been considered. The affordable housing tenure split that has been chosen has been selected because it is a viable option when compared against other reasonable alternatives which would not be viable. As such its selection ensures the Local Plan is deliverable over its period. In addition, the affordable housing tenure split that has been chosen accords with the policies of the Draft London Plan 2017 and the NPPF.
H2/3	H2	Support delivery of 50% affordable housing, subject to viability, and proposals for OPDC to function as the owner and developer of public land holdings within Old Oak, which potentially allow it a much	1	Ealing Council	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		wider range of tools to deliver new affordable housing.			
H2/4	H2	Welcome the fact that the OPDC Local Plan acknowledges that lack of new housing supply at genuinely affordable levels is a driver of increased levels of homelessness. However, OPDC could do more to maximise the supply of new homes that local people can afford, in particular the homeless.	1	Crisis Brent	No change proposed. The Local Plan is required to be in general conformity with the London Plan. The Draft London Plan 2017 sets a 50% affordable housing target for public sector land, Strategic industrial Location and, Locally Significant Industrial Sites deemed appropriate for alternative use. OPDC will deliver the Mayor's affordable housing tenures in conformity with Mayoral policy which are London Affordable Rent, London Living Rent and London Shared Ownership. These are defined in policy H2 and table 8.2.
H2/5	H2	Plan should specifically include the 35% (without public subsidy) and 50% (public land) thresholds set out in the Affordable Housing & Viability SPG.	1	Greater London Authority	Change proposed. Policy H2 now refers to the most up-to-date Mayoral policy and/or guidance on viability and thresholds. The supporting wording has been expanded to refer to the current applicable thresholds but these have not been directly quoted in the policy wording because the 35% threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance as set out in the draft London Plan 2017.
H2/6	H2	The reference to starting negotiations with a 50% affordable housing target (para 8.16) does not fully accord with	1	Greater London Authority	Change proposed. Policy H2 now refers to the most up-to-date Mayoral policy and/or guidance on viability and thresholds.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		approach set out in Mayor's Housing SPG. Especially as, later in the supporting text, the 50% requirement is open to negotiation and does not provide the certainty or clarity needed to influence land values. The presence of abnormal site constraints would be expected to impact land values and the cost should not necessarily be born through a reduction in planning obligations.			
H2/7	H2	The 50% housing target is very ambitious and unrealistic on private land. It would be better for the policy to require schemes to provide different targets for private and public land.		Old Oak Park Limited	No change proposed. The Local Plan is required to be in general conformity with the London Plan. The Draft London Plan 2017 sets an overall strategic 50% affordable housing target and a 50% target specifically for public sector land, Strategic industrial Location and, Locally Significant Industrial Sites deemed appropriate for alternative use. However, it is recognised in the supporting text that the actual level of affordable housing that is delivered through planning applications will have to be carefully balanced between infrastructure requirements, different tenure types and any public sector support that may be secured. Individual viability assessments will determine the actual

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					amount of affordable housing that can reasonably secured.
H2/8	H2	Support for approach outlined in OPDC's Strategic Housing Market Assessment.	1	Royal Borough of Kensington and Chelsea	Noted.
H2/9	H2	Support for the level of housing provision planned for. It is also noted that the OAN for the OPDC redline boundary area is identified as 1,200 homes over the plan period up to 2037. Therefore, the development being planned for will be significant in meeting wider needs.	1	Royal Borough of Kensington and Chelsea	Noted.
H2/10	H2	Supports the measures proposed in Policy H2 to increase the provision of affordable housing to meet local and wider need.	1	Royal Borough of Kensington and Chelsea	Noted.
H2/11	H2	There should be tenure mix flexibility as outlined in the SPG (30% LAR. 40% Intermediate, 40% flexible) to allow the Council to adopt the shared equity model as the alternative affordable housing product.	1	London Borough of Hammersmith and Fulham	No change proposed. The proposed tenure split (30% London Affordable Rent, 70% Intermediate) is compliant with the tenure requirements set out in the Mayor of London's Affordable Housing & Viability SPG. The Intermediate housing mix may include Shared Equity where it meets the requirements of the NPPF.
H2/12	H2, para 8.2	No clear explanation of the term "affordable homes".	1	Friary Park Preservation Group	No change proposed. Table 8.2 provides a definition of affordable housing which is in

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					accordance with the definition in the glossary of the National Planning Policy Framework and the definitions and requirements set out in the Mayor of London's Affordable Housing and Viability SPG and Draft London Plan 2017.
H2/13	H2	Clarity required on the incomes needed to purchase affordable intermediate homes.	12	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. Table 8.2 provides the details of the incomes required for intermediate homes. This is compliant with the income requirements set out in the Affordable Housing & Viability SPG and Draft London Plan 2017.
H2/14	H2	Policy should refer to the need for key worker accommodation and Church, community and youth workers should be considered eligible for such accommodation.	1	Diocese of London	No change proposed. The Mayor is introducing London Living Rent as an intermediate housing product with sub-market rents on time-limited tenancies, which will help households on average income levels to save for a deposit. Key workers would be considered eligible for this type of accommodation.
H2/15	H2	Provision of genuinely affordable homes should be prioritised as part of an uplift in values in the area that the transport improvements will generate.	1	David Craine	No change proposed. This is the purpose of the early and advanced stage review mechanisms that will be followed in accordance with the Affordable Housing & Viability SPG. This is set out in policy H2 to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					maximise the delivery of affordable housing where development viability improves.
H2/16	H2	50% affordable housing target is unrealistic when the Mayor is prepared to accept 35% or lower as determined by the threshold approach to viability.	13	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 has to work in accordance with the requirement set out in the Mayor of London's Affordable Housing and Viability SPG. The Draft London Plan 2017 sets an overall strategic 50% affordable housing target and a 50% target specifically for public sector land, Strategic industrial Location and, Locally Significant Industrial Sites deemed appropriate for alternative use.
H2/17	H2	Need to analyse the number of affordable and family homes that can be provided.	13	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. In accordance with the NPPF, objectively assessed need for housing based on households within the redline boundary is set out in the SHMA. Objectively assessed need for affordable housing in terms of tenure split will likely be achieved due to over delivery of housing above the OAN as demonstrated by the Development Capacity Study (2017). An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate ;43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate.

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					<p>This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing.; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. As such reasonable alternatives to the chosen affordable housing tenure split have been considered. The affordable housing tenure split that has been chosen has been selected because it is a viable option when compared against other reasonable alternatives which would not be viable. As such its selection ensures the Local Plan is deliverable over its period. The SHMA identified a 50% need for family housing. However, the identified SHMA need for family housing needs to be considered against the design and nature of the proposed development at Old Oak and Park Royal and development viability and economics, which shows that SHMA level family housing has an impact on viability. These issues were not considered as part of the SHMA assessment. Given this, 25% family housing is considered an appropriate target but that London Affordable Rent</p>

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					housing does meet its SHMA family housing need. This ensures that the most acute housing need is met. It also helps to ensure that family units are appropriately designed and located with suitable amenity space.
H2/18	H2	Having a threshold approach means that threshold becomes the standard. Developers should be expected to provide more CIL/S106 contributions if that is the case.	13	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 is required to be in conformity with the threshold and viability approach outlined in the Mayor of London's Affordable Housing and Viability SPG and draft London Plan 2017. Policy H6 in the draft London Plan 2017 states that " The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance".
H2/19	H2	The text of these policies is supported by precedent illustrations which almost invariably are of buildings 6-14 storeys height. This is misleading given the density required to meet the housing targets.	13	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. The photographs are not intended as exact illustrations of the heights of buildings but represent good examples of particular aspects of development, for example the proportion of affordable housing in a development which has been designed to be tenure neutral.
H2/20	H2	Need a variety of tenures including genuinely affordable rented accommodation.	13	Hammersmith Society, Wells House Road Residents Association,	No change proposed. The tenure mix is in conformity with the Affordable Housing and Viability SPG and Draft London Plan 2017.

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				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	This includes London Affordable Rent (equivalent to social housing at target rent levels), London Living Rent and London Shared Ownership.
H2/21	H2	The 50% affordable housing target is unjustified; it is clear that infrastructure costs of opening up sites in Old Oak will absorb large proportions of S106 and CIL resources limiting the capacity for affordable housing delivery.	15	Old Oak Interim Neighbourhood Forum, Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has undertaken a Strategic Housing Market Assessment to identify the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary in accordance with the NPPF. This has indicated a 45% need for affordable housing. The London-wide 2013 SHMA accompanying the current London Plan indicated a 52% affordable housing need city-wide. The Mayor of London has set a strategic target of 50% new homes in London should be affordable as set out in the Affordable Housing and Viability SPG and draft London Plan 2017. In addition, the draft London Plan 2017 sets a 50% target threshold for: public sector land; Strategic Industrial Locations; and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The London Housing Strategy also commits mayoral organisations such as OPDC to 50%. An Affordable Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>Viability Assessment 2017 has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure splits: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; and 30% London Affordable Rent/70% Intermediate is viable on all the site tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. The Whole Plan Viability Study provides detailed modelling of all policy requirements likely to impact on viability and concludes that, in the round, the policies would be viable. None of the viability modelling tests affordable housing grant which can be used on specific schemes to increase the amount of affordable housing towards the 50% target. OPDC will work with landowners, developers and Registered Providers to apply for grant from the Mayor of London's Affordable Homes Programme to increase affordable housing delivery beyond</p>

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					the level that would otherwise be provided without grant. Depending on the funding route, £23k or £43k per additional home beyond the threshold level can be used.
H2/22	H2	Concerned that on evidence to date of permissions granted, coupled with Policy H2a) committing to follow Mayoral guidance, suggests that developers will increasingly pursue offers of 35%, with most units at 80% market rent rather than London Affordable Rent.	15	Old Oak Interim Neighbourhood Forum, Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is required to follow the viability and threshold approach as set out in Mayoral Guidance and in order to help meet the affordable housing needs identified in OPDC's SHMA. The actual affordable tenure that can be delivered on any given scheme is dependent on a number of factors including development viability but also the design of the scheme in terms of separate cores and how different affordable tenures can be managed effectively to keep service charges low, particularly for London Affordable Rent tenants.
H2/23	H2	Housing must be affordable to local residents, including those on below average incomes and who are in unsatisfactory housing.	1	Harlesden Lets	No change proposed. In accordance with the London Mayoral policy and/or guidance, affordable housing is required to meet a range of needs of households who cannot afford private housing. This includes London Affordable Rent for households on the lowest incomes who are on a council housing waiting list and have been awarded a reasonable preference (for example: unsatisfactory housing) but also London Living Rent for those on low to medium incomes who are renting privately and wish to save money for a deposit and Shared

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Ownership. As an extra safeguard, this policy requires developments to include units that are "affordable to households on average incomes in the host local authorities
H2/24	H2	Given the fact that only 30% London Affordable Rent will be delivered in OPDC's area, it will put pressure on the neighbouring boroughs to help meet the OAN.	14	Harlesden Lets, 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. In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs (OAN) for market and affordable housing in the local housing market area. According to OPDC's Strategic Housing Market Assessment (SHMA) and based on the area's current population as is required in the NPPF, there is an objectively assessed need for 1,200 additional homes over the Local Plan period (2018 to 2038). The tenure requirements as set out in the SHMA (86% London Affordable Rent) can be delivered for these homes. OPDC's overall development capacity as identified in the Development Capacity Study far exceeds 1,200 new homes. As highlighted in the Housing Evidence Statement, as Opportunity Areas Old Oak and Park Royal can help meet sub-regional housing need that is required across the wider housing market area of the three neighbouring boroughs.
H2/25	H2	Local communities will not benefit from the affordable housing policy because of the proposed tenure split.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas	No change proposed. The NPPF states that local planning authorities should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	market area, as far as is consistent with the policies set out in this Framework" (paragraph 47) and consider whether other policies [e.g.: viability of development] justify constraining that full objective assessment of need. Objectively assessed housing need has been set out in the SHMA. The objectively assessed need in terms of affordable housing tenure split has been constrained by viability considerations, and this is explained in the Affordable Housing Viability Assessment. The affordable housing tenure split that has been chosen has been selected because it is a viable option when compared against other reasonable alternatives which would not be viable, given the requirement for OPDC to have a 50% affordable housing target. The tenures required by the policy are in general conformity with the draft London Plan 2017 and are in accordance with the NPPF definitions. As an extra safeguard, this policy requires developments to include units that are "affordable to households on average incomes in the host local authorities" and therefore, they are accessible to surrounding communities.
H2/26	H2	Concern about the impact of development on house prices in neighbouring areas which	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents	No change proposed. One of the main reasons for high house prices and high rents is the lack of supply. The regeneration of Old

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		have already seen some of the biggest increases in London.		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	Oak and Park Royal will increase the supply of housing, including affordable housing and help address the in-balance between supply and demand.
H2/27	H2	Table 8.2 should also clarify that for London Living Rent, applicants must already be renting and want to build up money to buy their home.	14	Harlesden Lets, 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- to clarify definition.
H2/28	H2	The description of London Affordable Rent in Table 8.2 should be amended to say 'capped' target rents, in accordance with government guidance. This should exclude service charges.	14	Harlesden Lets, 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- to clarify definition.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H2/29	H2	High rent affordable housing should not be classed as affordable.	1	Harlesden Lets	No change proposed. OPDC is adopting the affordable housing tenures as required in the Mayor of London's Affordable Housing and Viability SPG and this approach is consistent with the NPPF.
H2/30	H2	Less affordable housing on one site should only be permissible if an alternative site is providing a higher percentage.	1	Harlesden Lets	No change proposed. OPDC's overall affordable housing target is 50%. However, each planning application will be considered on its merits and in accordance with the Mayor of London's Affordable Housing & Viability SPG and Draft London Plan 2017.
H2/31	H2	Where developers do not achieve a set percentage, they should be asked to produce their detailed costings, which should be scrutinised.	1	Harlesden Lets	No change proposed. As set out in the policy and supporting text, OPDC will apply the threshold and viability approach as set out in Mayoral policy and/or guidance.
H2/32	H2, para 8.18	50% affordable housing is unachievable on sites with requirements to deliver infrastructure and other site constraints (e.g.: relocation of existing business). This should be specifically recognised in the policy text.	2	Castlepride Limited, Old Oak Park Limited	Change proposed. The supporting text has clarified that on some sites within OPDC, 50% affordable housing will be difficult to achieve. This will particularly be the case on sites that require significant infrastructure to unlock development, such as within Old Oak South and Old Oak North. It is clear in the AHVA and in the Local Plan itself that individual sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process.

Policy H3: Housing Mix

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H3/1	H3	OPDC should allow greater flexibility in its policies for housing mix in areas identified for early development opportunities, such as Scrubs Lane.	1	Remavon	No change proposed. Policy H3 provides a balance between delivering 50% affordable housing, family housing requirements as identified in the Strategic Housing Market Assessment and providing appropriate private amenity space in a high density flatted environment.
H3/2	H3	Clarification on what is meant by housing that is 'appropriately and flexibly designed for changing needs over time'. Any relevant guidance should be directly referenced in the supporting wording.	1	Ealing Council	Change proposed. The supporting wording has been amended to reference the guidance in the Mayor of London's Housing SPG 2016 on designing in flexibility. This includes, for example, designing internal walls in a way that they can be sub-divided.
H3/3	H3	The 25% family housing target is not appropriate; only 20% on average has been delivered London-wide and the nature and density of development at Old Oak means that units will not have appropriate amenity space.	15	Old Oak Park Limited, Fruition Properties, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. As explained in the Housing Evidence Statement, the average density of the proposed development is expected to be high density and the built form is expected to be high density blocks of flats (as opposed to houses with gardens) making a 50% family housing target as is needed according to the SHMA undesirable as many units would

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	be unable to access appropriate amenity and play space.
H3/4	H3, para 8.36	It is difficult to see how to build in flexibly in flats to allow for units to expand or contract. It is suggested that changes are limited to internal changes.	1	Old Oak Park Limited	Change proposed. The supporting wording for Policy H3d) has been amended to recognise the fact that designing flats so that they can expand or contract in size will be more feasible on long-term rented units than flats built for sale when there will not be an opportunity to change the footprint of the unit.
H3/5	H3	The priority should be for affordable family housing.	1	David Craine	No change proposed. Housing Mix Policy H3 specifies that developments should deliver a London Affordable Rent housing mix in accordance with OPDC's most up to date Strategic Housing Market Assessment (SHMA). This meets the acute need for London Affordable Rent but also provides some market family and intermediate housing to help meet needs.
H3/6	H3	Some of the supporting text in H3 should be moved to H4.	13	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. Policy H4 sets out how family housing should be sensitively designed and appropriately located so that it is suitable for families with children. The introductory text to H4 refers to delivering a mix in accordance with Policy H3 where the supporting text details the identified needs for family housing.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
H3/7	H3, para 8.37	Support policy on designing in flexibility.	13	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.
H3/8	H3, para 8.35	Internal space standards should comply with London Plan recommendations as a minimum.	13	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. This is as required in the supporting text.
H3/9	H3	The policy should be amended to require 51% family sized affordable housing and 64% family market housing as evidenced by the SHMA.	16	Old Oak Interim Neighbourhood Forum, Hammersmith Society, Harlesden Lets, Grand Union Alliance, Wells House Road Residents	No change proposed. The Housing Evidence Statement explains that the identified SHMA need for family housing needs to be considered against the design and nature of the proposed development at Old Oak and Park Royal and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	development viability and economics, which are not considered as part of the SHMA assessment. Given this, 25% family housing is considered an appropriate target but that London Affordable Rent housing does meet its SHMA family housing need. This ensures that the most acute housing need is met. It also helps to ensure that family units are appropriately designed and located with suitable amenity space.
H3/10	H3	Evidence of overcrowding in the SHMA is not being addressed. This could be addressed by delivering more larger family homes as evidenced in the London Assembly Crowded Homes report delivering a downchain to release smaller units for smaller households.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's SHMA identifies that overcrowding is most significant in the social housing sector and that it has become more significant in the private rented sector in recent years but that levels of overcrowding have been stabilising. By delivering family-sized London Affordable Rent homes in accordance with the SHMA requirements, OPDC can help to address overcrowding in the social housing sector. Delivery of London Living Rent homes can also help address the issue of overcrowding in the private rented sector as there will be an increased supply of affordable homes available for private renters who may otherwise overcrowd. Other policies in this Local Plan, for example, H9, promotes the delivery of specialist housing which can

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					free up existing family housing and help alleviate overcrowding.
H3/11	H3	Targets should be set for 4 and 5 bed units in accordance with the SHMA need.	14	Grand Union Alliance, Harlesden Lets, 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. For London Affordable Rent homes, Policy H3 requires the delivery of a SHMA compliant mix. This will mean that the need for four and five bedroom London Affordable Rent homes identified in the SHMA can be met. The 25 per cent over-arching target also allows for larger units to be provided in other tenures but in a way that is sensitive to viability and the nature of the development in the area.
H3/12	H3	Need to set out how OPDC will work with the boroughs to meet need for family housing.	14	Harlesden Lets, 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. According to OPDC's Strategic Housing Market Assessment (SHMA) and based on the area's current population as is required in the NPPF, there is an objectively assessed need for 1,200 additional homes over the Local Plan period (2018 to 2038). Given the overall capacity for homes is much larger, approx. 20,000 homes over the Local Plan period, the objectively assessed family housing requirements based on the existing population can be met, in addition to assisting the London Boroughs of Brent, Ealing and Hammersmith & Fulham to meet their family housing requirements.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H3/13	H3	OPDC will not achieve a mix comparable with the surrounding area and may limit the ability of smaller households to grow and remain in the area in the long-term.	14	Harlesden Lets, 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. Old Oak and Park Royal are Opportunity Areas in the London Plan. Given the need to optimise development to meet the housing targets, the development will not be of the same built form of the existing housing in the surrounding area. However, it can be complementary and provide a housing mix to meet a range of needs both to newly forming households and established households in the surrounding area who wish to move. Smaller units built can provide opportunities for under-occupying existing households in the surrounding area to down-size thereby providing opportunities for growing families to move up. In addition, the new development can provide new affordable family units.
H3/14	H3	Harlesden Lets would be pleased to pay a role in supporting families in private rented accommodation.	1	Harlesden Lets	Noted.
H3/15	H3	Need to future proof dwellings so that they are easier to adapt if residents become disabled. Need to consider this in all areas of the building.	1	Harlesden Lets	No change proposed. Policy H3 ensures that 90% of units are delivered to Building Regulation M4(2)"accessible and adaptable dwelling" standard. Policy D3 requires proposals for buildings, open spaces, the public realm and infrastructure to adhere to the latest guidance on accessible and inclusive design.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H3/16	H3	Developments have not been delivering significant proportions of family housing.	1	Harlesden Lets	Noted.
H3/17	H3	There is an equalities impact from not delivering more family housing to ease the impact of overcrowding which is more prevalent in BME communities.	1	Harlesden Lets	No change proposed. The Integrated Impact Assessment has identified that the housing policies as a whole will have a positive impact on delivering a mixed and sustainable community.

Policy H4: Design of Family Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H4/1	H4	It would be useful to acknowledge where residential sites are suited to providing commercial use and active frontages at street level, family accommodation will need to be on the upper floors.	1	Castlepride Limited	No change proposed. The policy and supporting text allows for family housing to be located on other floors with access to secure private and/or communal open space.
H4/2	H4, para 8.39	Given the 25% family housing target, most family units delivered will be provided in accordance with Part B.	1	Old Oak Park Limited	Noted.
H4/3	H4	There are no details about the provision of family housing.	1	Friary Park Preservation Group	No change proposed. The policy provides guidance on the design of family housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					to ensure that it is appropriately located to be suitable for families with children.
H4/4	H4	Concerns over lack of commitment to building affordable family home in accordance with the need identified in the Strategic Housing Market Assessment (SHMA).	12	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 Affordable Housing Viability Assessment modelling shows that delivering SHMA levels of family housing has an impact on the viability of delivering 50% affordable housing overall because larger units are worth less per square foot than 1 and 2 bed units. Setting a higher family housing target would also mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.
H4/5	H4	The policy would benefit from more detailed guidance on housing design, such as the GLA's Housing Design Guide.	13	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. The Mayor of London's Housing SPG 2016 provides guidance on housing design. There is not a need to repeat this in OPDC's Local Plan.

Policy H5: Existing Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H5/1	H5	Support approach to resist loss of existing residential accommodation unless it is critical to unlock comprehensive regeneration.	2	T.A.S.B. Investments Limited, Hammersmith Society, Friary Park Preservation Group	Noted.
H5/2	H5	This policy is currently mis-phrased to mean that only the conversion as a whole would require access to private or communal open space. Suggest 'at least one family sized unit (3+ bed) with access to private or communal open space is provided through each conversion.' It should also be clarified in the supporting wording that this does not alter the London Plan requirement for 'private amenity space'.	1	Ealing Council	Change proposed. The policy now reads "at least one family sized unit (3 bed+) with access to secure private and/or communal space is provided through each conversion". However, given the layout of the building it might not always be possible for the non-family units in a converted house to have access to secure private space although these units will be required to meet the minimum space standards.
H5/3	H5	Policy is sound.	1	Friary Park Preservation Group	Noted.
H5/4	H5	Empty homes should be brought back to full occupancy.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Policy H5 and the supporting text provides for OPDC to "work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham and other stakeholders to bring vacant residential properties back into use".

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
H5/5	H5	The policy should set a consistent and robust approach to EDMOs and CPOs and a mechanism for dealing with appeals.	1	Harlesden Lets	No change proposed. OPDC's powers are limited in this area. OPDC will positively work with the local authorities when they issue Empty Property Management Orders. Where necessary and appropriate, and there is a compelling case in the public interest, OPDC will use compulsory purchase powers as set out in Policy DI4.
H5/6	H5	The policy should specify how exactly it will resist loss of existing housing. The policy should support retrofitting on new homes. It should also ensure that where a proposal would result in new housing that it re-provides an equal amount of space, rooms and tenure.	14	Grand Union Alliance, Harlesden Lets, 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 powers are limited in this area. OPDC will work positively with the local authorities and landowners to bring empty properties back into habitable use as is set out in the supporting text. Replacing existing housing on at least a like-for-like basis in terms of unit numbers and floorspace is set out in the policy and supporting text. In terms of tenure, the key concern is protecting affordable housing units from loss. This is covered through the perpetuity provisions in Policy H2.

Policy H6: Build to Rent

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H6/1	H6	Concerns about the affordability of London Living Rent or similar and whether it will be affordable to local people.	15	Crisis Brent, Harlesden Lets, Grand Union Alliance, London Borough of Hammersmith and Fulham, 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. London Living Rent is one of three types of affordable homes supported by the Mayor of London, as required by the Affordable Housing & Viability SPG 2017 and Draft New London Plan Policy H7. London Living Rents are for low to middle-income households who now rent privately and want to build up a deposit to buy a home by making savings on their monthly rent. OPDC has agreed a Nominations Policy to ensure that eligible local people are prioritised for London Living Rent homes delivered in the local area.
H6/2	H6	As Build to Rent schemes are typically tenure blind, they provide an opportunity to deliver mixed income communities provided that viability considerations can be addressed.	1	Crisis Brent	Noted.
H6/3	H6	Include a statement in the Local Plan signalling its intention to encourage delivery of a proportion of a Built to Rent housing for those on the lowest incomes.	1	Crisis Brent	No change proposed. The policy has been drafted in accordance with the Mayor of London's Affordable Housing & Viability SPG and Draft New London Plan Policy H7. This specifies that Build to Rent schemes are not required to provide London Affordable Rent housing, i.e.: social rent. This is because Build to Rent providers are not required to be Registered Providers of Social Housing. London Living Rent is the Mayor of London's

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					preferred affordable housing product for schemes under this policy.
H6/4	H6	Query how this policy will provide affordable housing on Build to Rent, as it is not clear how they will meet the 35% threshold.	1	London Borough of Hammersmith and Fulham	Change proposed. The policy and supporting text has been amended to be in general conformity with the Draft New London Plan 2017. In accordance with Policy H2 (of OPDC's Local Plan), Build to Rent housing will be subject to the Mayor of London's most up-to-date threshold approach to viability. The threshold approach to viability is set out in London Plan Policy H7.
H6/5	H6	Support policy on build to rent.	13	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.
H6/6	H6, para 8.50	Affordable housing should be in perpetuity. Policy should set out how loss of existing housing will be resisted and require schemes to reprove an equal amount of space, rooms and tenure.	1	Harlesden Lets	No change proposed. As set out in the supporting text and in accordance with the NPPF, Build to Rent affordable units must be retained as affordable units in perpetuity, regardless of whether the separate full market rent units are sold out of the rental market at any point. If private rent units are sold, the sale of the affordable units will only

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					be accepted if it can be fully demonstrated that the units cannot be retained as affordable housing. In such cases the equivalent level of affordable tenure housing should be provided in the vicinity of the site.
H6/7	H6	Clarify whether policy H6 is only seeking London Living Rent or if not, clarify that it is seeking some provision at higher rent levels.	14	Harlesden Lets, 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. The policy and supported text has been amended in accordance with Draft New London Plan 2017 Policy H13 to specify that Build to Rent will be required to provide affordable housing in the form of discount market rent, at least 30% at London Living Rent levels.
H6/8	H6	Deposit savings options should not be compulsory or a condition of the tenancies.	1	Harlesden Lets	No change proposed. This was a policy option in the Regulation 18 version of the Local Plan that has not been taken forward. Deposit saving options will not be compulsory.
H6/9	H6	Build to Rent lets should be on assured (non-shorthold) tenancies to support the creation of lifetime neighbourhoods.	1	Harlesden Lets	No change proposed. The Affordable Housing & Viability SPG and Draft New London Plan 2017 Policy H13 sets out the tenancy requirements: longer tenancies (three years or more), with break clauses that allow the tenant to end the tenancy with a month's notice any time after the first six months. Providers will be required to offer rent certainty for the period of the tenancy,

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the basis of which should be made clear before a tenancy agreement is signed, including any annual increases which should always be formula-linked. Build to Rent will have to be operated by providers who have a complaints procedure in place and are a member of a recognised ombudsman scheme; and not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.
H6/10	H6	OPDC should set an annual target to measure/monitor delivery of Build to Rent.	14	Harlesden Lets, 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. Build to Rent will provide units that will be measured and monitored as part of the overall housing supply targets set out in the Local Plan as well as the affordable housing targets where the units are delivered as affordable housing.

Policy H7: Purpose-Built Shared Housing and existing HMOs

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H7/1	H7, para 8.61	OPDC should look again at how it could encourage innovation in the area of HMOs to make on-	1	Crisis Brent	No change proposed. This policy supports the retention of existing high quality HMOs which can provide affordable

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		site provision of affordable housing.			accommodation for single households. However, as set out in the supporting text, large-scale purpose-built shared housing is unlikely to be available at a price that is affordable for a household with an affordable housing need. However, this can generate a commuted sum to fund additional supply of conventional affordable housing. This policy is in conformity with the Draft London Plan 2017 (Policy H18).
H7/2	H7	Support the role HMOs can play in meeting housing need provided they are affordable, well-managed and offer tenancy sustainment support	2	London Borough of Hammersmith and Fulham, Harlesden Lets	Noted.
H7/3	H7	Support policy on shared housing.	13	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.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H7/4	H7, para 8.63	HMOs are causing significant issues in existing residential communities and stronger policies are required to manage them.	22	Mark Walker, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Harlesden lets, Nicky Guymer, Bruce Stevenson, Dave Turner of TITRA, Mark Walker, Midland Terrace Residents, Nye Jones	No change proposed. OPDC does not have Housing Act licencing or enforcement powers for HMOs. However, OPDC will work positively with the London Boroughs of Brent, Ealing and Hammersmith & Fulham in ensuring effective management of HMOs. This is already set out in Policy H7 and in the supporting text.
H7/5	H7	Overcrowded HMOs will be the only affordable option for many residents.	1	Harlesden Lets	No change proposed. By increasing the housing supply OPDC can help redress the imbalance between housing need and housing supply by providing affordable housing to meet a range of needs and incomes. This policy supports the retention of existing HMOs meeting the necessary standards and supports the building of new purpose-built shared housing which can generate a commuted

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					sum to fund conventional affordable housing.

Policy H8: Gypsy and Traveller Accommodation

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H8/1	H8	The plan should recognise that there are current problems with the Bashley Road gypsies and travellers site that warrant addressing, including poor drainage, noise and disturbance and vehicle access.	14	Harlesden Lets, 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. The London Borough of Ealing owns the site and as a housing authority is responsible for managing and maintaining the site in order to meet relevant environmental health standards. However, the policy wording has been amended to state that OPDC will work positively with London Borough of Ealing to enhance the existing site where this is appropriate.
H8/2	H8	Policy H8 supporting text states that there is no need arising in the OPDC area for Traveller pitches. The OPDC GTANA (2017), Policy H8 and supporting text does not acknowledge that LBHF and RBKC are jointly responsible for a Traveller site at Stable Way and that the two Councils have completed a Joint GTANA (Dec 2016). The study	1	Royal Borough of Kensington and Chelsea	No change proposed. There is one Gypsy and Traveller Site within OPDC's boundaries at Bashley Way, Park Royal. OPDC's Gypsy and Traveller Accommodation Needs Assessment (GTANA) identified that there was no need for additional pitches during the Local Plan period, in accordance with guidance on completing GTANAs and the Planning Policy for Traveller Sites (PPTS). The Royal Borough of Kensington & Chelsea and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		applies the PPTS definition of Travellers and concludes that the total accommodation needs across the two boroughs, LBHF and RBKC, is 9 pitches to 2030. This needs to be acknowledged and considered as part of the OPDC GTANA, Policy H8 and associated supporting text to reflect that there is need arising within LBHF, fulfil the Duty to Cooperate and satisfy the tests of soundness. The policy approach also does not reflect the work that LBHF is currently undertaking in respect of identifying sites to help meet need arising in the Joint GTANA. There are potential opportunities for additional pitch provision to be delivered as part of OPDC regeneration proposals, for land within the LBHF area, to assist LBHF to meet its joint Traveller needs.			London Borough of Hammersmith & Fulham are jointly responsible for one permanent site outside of OPDC's boundaries. OPDC has conducted a site assessment of land in its area to help meet needs of the Gypsy and Traveller community in these two boroughs. This has concluded that there is no land available.
H8/3	H8	Support for the policy which states that OPDC will work with the boroughs and give careful consideration to the future needs of gypsies and travellers.	1	London Borough of Hammersmith and Fulham	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H8/4	H8	Noted potential difficulty in providing sites for gypsies and travellers.	13	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.
H8/5	H8, para 8.64	The plan should recognise that there are current problems with the Bashley Road gypsies and travellers site that warrant addressing, including poor drainage, noise and disturbance and vehicle access.	15	Harlesden Lets, Grand Union Alliance, Ealing Council, 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 policy now specifies that OPDC will safeguard the site and work positively with London Borough of Ealing to improve the existing site so that it continues to provide suitable accommodation. The supporting wording has also been amended to clarify the planning authority's obligations in terms of safeguarding the site and the housing authority's obligations in terms of housing standards and conditions.

Policy H9: Specialist Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H9/1	H9	The Plan does not protect against the loss of existing specialist accommodation. Recommended that the policy also include: 'Proposals for conversions or loss of existing specialist housing will be supported where they: f) no longer meet identified local need for specialist housing; g) do not comply with any relevant standards, including quality; h) give rise to unacceptable impacts on amenity, or i) are not required through their reconfiguration or redevelopment for a recognised specialist housing need.'	1	Brent Council	Change proposed. Criteria have been added to this policy to assess the loss of this form of housing.
H9/2	H9	This policy is currently very open-ended. Suggested that is should support specialist housing that meets identified needs.	2	Ealing Council, Harlesden Lets	Change proposed as suggested. This is to clarify that proposals for specialist housing should meet an identified need.
H9/3	H9	Policy should ensure mix of specialist housing with other types of units to support lifetime neighbourhoods and social mix.	1	Ealing Council	No change proposed. The policy will support lifetime neighbourhoods and a social mix by requiring large residential schemes of over 1,000 units to provide 10 per cent specialist housing.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H9/4	H9	Requiring 10% homes as specialist housing will have a detrimental impact on viability. It is better to provide some flexibility such as that contained in the student housing policy	1	Old Oak Park Limited	No change proposed. OPDC's SHMA identifies an 8.6% need for specialist housing. As with the level of affordable housing and family housing, the specialist housing requirements on sites will be considered as part of the planning application process and subject to development viability.
H9/5	H9	Where wheelchair accessible housing is provided, there needs to be a consideration for parking spaces.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC's Local Plan requires disabled car parking to accord with mayoral policy. The new draft London Plan 2017 states that disabled residential parking should be provided in new developments (for both M4(2) and M4(3) dwellings) but that this should count towards the maximum parking provision for the development.
H9/6	H9	There are no details about the provision of specialist housing.	1	Friary Park Preservation Group	No change proposed. Policy H9 sets a target for the delivery of specialist housing and sets out that this should be appropriately designed for the intended occupiers and support they require. Individual planning applications will provide details of actual specialist units that are to be delivered.
H9/7	H9	There needs to be an effective provision of specialist housing, particularly for older people.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. This is why the policy sets a specialist housing target in order that specialist housing needs can be met in the area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

Policy H10: Student Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H10/1	H10	Support policy to meet increasing demand for student places, and the role this can play in placemaking and relieving pressure or demand for other housing types.	15	Imperial College, Citrus Group and Fuller Smith & Turner, 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.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H10/2	H10	This policy should also make reference to high quality design and space standards to ensure that internal spaces are liveable.	1	London Borough of Hammersmith and Fulham	Change proposed. A policy line on high quality design of internal space has been included.
H10/3	H10	The policy is failing to protect against a mono-type of housing form developing in the area, e.g.: North Acton. Large areas of development of student accommodation creates a transient community, consisting almost exclusively of one demographic – rather than a diverse lifetime neighbourhood.	15	Old Oak Interim Neighbourhood Forum, Harlesden Lets, 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 H10 is intended to ensure that student housing is provided as part of a diverse housing mix that does not undermine delivery of conventional housing supply. In terms of North Acton specifically, Policy P7 envisages contributing to the delivery of 4,300 new homes during the first 10 years and "appropriate levels of student accommodation". This policy also plans for improving the public realm and infrastructure in the area.
H10/4	H10	It is not clear how the OPDC will measure and monitor undermining of conventional self-contained housing supply and 'overconcentration' in any one specific location.	14	Harlesden Lets, 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 to Policy H1 in accordance with draft London Plan 2017. Every three student bedrooms that are completed equate to meeting the same need that one conventional housing unit meets, and contribute towards meeting OPDC's housing targets. This will enable OPDC to measure and monitor student housing delivery so that it does not undermine delivery of the overall housing target. Any new student housing in locations such as North Acton will be required to meet Policy H10 requirements

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					in delivering a sustainable and mixed community.
H10/5	H10	The policy should include a map that shows areas where this already an over-concentration of student accommodation and where it may be appropriate to deliver more, subject to need being demonstrated.	14	Harlesden Lets, 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. It is recognised in Policy P7 that North Acton is home to recently built and permitted high density student accommodation and that in order to deliver a sustainable and mixed community, proposals for new student accommodation will need to accord with Policy H10.
H10/6	H10	The Policy should set out the need for student housing.	14	Harlesden Lets, 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. The Policy and supporting text has been added for proposals to have to demonstrate there is a local or London need for student housing.
H10/7	H10	The policy should stress the need for social infrastructure to support the needs of students and avoid putting stress on services.	14	Harlesden Lets, 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,	No change proposed. This is set out in the requirements for providers to produce a Residential Management Plan to ensure that the impacts on local amenity are mitigated. The need for social infrastructure will be assessed against Policy TCC4.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
H10/8	H10	OPDC is responsible for meeting the housing needs of all students within the housing market area, not students belonging to a specific organisation.	14	Harlesden Lets, 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. The student accommodation must either be operated directly by a higher education institution or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions, in accordance with the Draft New London Plan 2017.
H10/9	H10	Student housing should ensure delivery of an appropriate quota of publicly accessible green and open spaces.	13	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. Student housing as well as other housing developments will be required to provide or make appropriate contributions to public open space in accordance with Policy EU1.

9. Employment

General

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E/1	ALL	Employment policies are too prescriptive and have a value impact which is not reflected in the evidence base. Policies would affect the overall viability of development proposals	1	DS2 (on behalf of Old Oak Park Limited)	No change proposed. The Whole Plan Viability Study has tested the cumulative impact of the policies in the Local Plan. The requirements for applicants to demonstrate robust engagement with affected businesses throughout pre- and formal application process is aligned with OPDC's SCI. The requirement to co-locate floorspace only applies to broad industrial type activities which are compatible with the Place land use policy. With regards to potential site-specific viability impacts, Policy D11 makes it clear that, OPDC will appropriately balance the priorities for a range for contributions, this would include any requirements for affordable workspace. This would be assessed on a case by case basis.

E/2	ALL	Employment policies are too prescriptive and have a value impact which is not reflected in the evidence base. Policies would affect the overall viability of development proposals	1	DS2 (on behalf of Old Oak Park Limited)	No change proposed. The Whole Plan Viability Study has tested the cumulative impact of the policies in the Local Plan. The requirements for applicants to demonstrate robust engagement with affected businesses throughout pre- and formal application process is aligned with OPDC's SCI. The requirement to co-locate floorspace only applies to broad industrial type activities which are compatible with the Place land use policy. With regards to potential site-specific viability impacts, Policy DI1 makes it clear that, OPDC will appropriately balance the priorities for a range of contributions, this would include any requirements for affordable workspace. This would be assessed on a case by case basis
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Policy E1: Protecting Existing Economic and Employment Floorspace

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E1/1	E1	Support the objective of draft Policy SP5 which seeks the protection, strengthening and intensification of the Strategic Industrial Location (SIL) in Park Royal. However, SIL sites require supporting/ancillary uses for workers etc. more	10	CBRE (on behalf of SEGRO)	No change proposed. The provision of small scale 'walk to' services for industrial occupiers is covered in the Town Centre and Community Uses chapter.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		flexibility should be built into the SIL definition.			
E1/2	E1	A strong commitment to reproviding affordable workspaces is required, including monitoring. Existing artist studios in the area should be acknowledged.		Joanna Betts; ACAVA; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Grand Union Alliance; Jeremy Aspinall; Thomas Dyton;	Change proposed. Policy E2 has been amended to clarify the requirements for supporting businesses. Policy E3 also requires an appropriate quantum of affordable, shared or small business units. The proposed Local Plan Key Performance Indicators (KPIs) include a measure of total area of affordable employment floor space proposed in permitted schemes, as a proportion of overall employment space. The Local Plan KPIs will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report. The supporting text for E1 acknowledges that there is a well established network of artist studios in the area.
E1/3	E1	Concern about the negative impacts of job/business losses and strategies for relocation and reprovision are unrealistic. A stronger commitment, monitoring and more information is required to manage displacement and ensure existing businesses are supported.	13	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. The jobs capacity figures are now expressed as new jobs. OPDC has updated the Industrial Land Review to demonstrate how no net loss of industrial floorspace would be achieved through the Local Plan, including reprovision of industrial floorspace in Old Oak. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Intensification will provide increased capacity to accommodate incompatible uses being relocated from Old Oak. Policy E2 has been amended to clarify the requirements for supporting businesses. Policies E1 and E2 also support the delivery of workspaces for identified growth sectors which includes existing sectors which are important to the local economy. The Local Plan Key Performance Indicators (KPIs) will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report. The KPIs will monitor the loss/gain of employment floorspace and a number of employment and business related indicators.
E1/4	E1	Policy on SIL is too narrowly worded and does not properly reflect proposals for the Twyford Tip site.		Turley (on behalf of Ashia Centur Limited)	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission (granted in 1993). However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					designated as part of the Strategic Industrial Location (SIL).
E1/5	E1	Support proposed de-designation of SIL is integral to delivering development of the Old Oak Common Opportunity Area. Protection and intensification of the remaining SIL will also be important.		GLA	Noted.
E1/6	E1	Arrangements should be put in place for businesses affected by SIL de-designation. Policy requiring a sequential approach to support the relocation of businesses affected by SIL designation should be strengthened.		GLA	Change proposed. It is noted that the new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan. Policies E1 and E2 have been amended to reflect the Industrial Land Review Addendum. Achieving no net loss in industrial floorspace will ensure that businesses have the opportunity to relocate within OPDC 's area and should mean that the sequential approach can be implemented effectively. Policy E2 and its supporting text have been amended to clarify requirements for supporting business relocation.
E1/7	E1	Many existing businesses are unlikely to be compatible with the new vision for the area.		DS2 (on behalf of Old Oak Park Limited)	No change proposed. It is noted that the new draft London Plan (2017) requires no net loss of industrial floorspace capacity

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Policy requirements for re-providing/relocating existing and providing new or affordable workspace are inappropriate, onerous and create a tension with viability of funding delivering infrastructure and homes/job targets.			within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan, including through industrial intensification and co-location of uses. Policies E1 and E2 have been amended to reflect this requirement. The requirement to co-locate floorspace only applies to broad industrial type activities which are compatible with the Place land use policy.
E1/8	E1	OPDC should also utilise GVA to measure growth of industry in Park Royal.		Park Royal Business Group	Change proposed. Additional Key Performance Indicators have been added for total GVA. The Local Plan cannot control the businesses that take up the commercial floorspace created through development, therefore it will not be possible to measure growth in specific sectors as part of the planning process. However, future updates to the evidence base will be able to assess and analyse strategic changes in the local economy.
E1/9	E1	Impact of automation on employment needs to be better addressed in the Plan and evidence base.		DS2 (on behalf of Old Oak Park Limited)	No change proposed. The full impact of automation cannot be accurately known or predicted. It is important that planning policy ensures that development proposals retain flexibility so that the area is capable of responding to changes over time.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E1/10	E1	Careful consideration needs to be given to occupier needs and their operational requirements as part of intensification.		CBRE (on behalf of SEGRO)	No change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. This Study demonstrates that there are sites where it is possible to increase the amount of floorspace and jobs in Park Royal. The Local Plan will require all sites to be intensified where feasible and changes have made to confirm this. If intensification is not feasible, this should be demonstrated by the applicant.
E1/11	E1	Request that OPDC takes on a more proactive role such as identifying and allocating new sites for industrial development, and/or by assisting in the land assembly process to ensure such sites are available. This will help ensure that there is sufficient support within the Plan to facilitate the delivery of the site allocation objectives.		CBRE (on behalf of SEGRO)	Change proposed. It is noted that the new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan, including through industrial intensification and co-location of uses. New industrial site allocations have been introduced and Policies E1 and E2 have been amended to reflect this requirement. Policy DI3 also provides guidance on how OPDC will help facilitate delivery of development.
E1/12	E1	c)Insert 'be':		London Borough of Hammersmith and Fulham	Noted. This policy requirement is now covered in Policy D6.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E1/13	E1	Support protection of existing economic functions and creation of new jobs	13	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.
E1/14	E1	Should reclassify Park Royal as Strategic Commercial Land as there is a whole range of employment uses ranging from offices to industrial, catering to small craft businesses	13	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. The term Strategic Industrial Location is used to reflect its designation in the London Plan and to ensure clarity and consistency with the scope of protection for a range of industrial uses in this area. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, the loss of industrial land across London and the ongoing demand for industrial space. Policy P6 and TCC1 seek to ensure there is a good range of facilities available to support local businesses and residents including additional town centres uses.
E1/15	E1	Need additional detail on how to support businesses and affordability	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts,	Change proposed. Policy E2 and its supporting text has been amended to clarify the arrangements for supporting

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	businesses. Policy E3 sets out policy criteria to secure an appropriate quantum of affordable, shared and/or small business units in order to support specific purposes i.e. to help start-up businesses. Introducing additional detail in the policy would adversely affect the clarity of the policy. OPDC may consider preparing an Affordable Workspace SPD to provide more detailed guidance on this area of policy. An SPD can also be updated more regularly than a Local Plan document to respond to changes over time.
E1/16	E1	A strong commitment to re-providing affordable workspaces is required, including monitoring. Existing artist studios in the area should be acknowledged.		Joanna Betts; ACAVA; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Grand Union Alliance; Jeremy Aspinall; Thomas Dyton;	Change proposed. OPDC has updated the Industrial Land Review to demonstrate how no net loss of industrial floorspace would be achieved through the Local Plan, including re-provision of industrial floorspace in Old Oak and the intensification of Park Royal. Policies E1 and E2 have been amended to reflect this requirement and clarify the arrangements for supporting businesses. Policies E1 and E2 also support the delivery of workspaces for identified growth sectors which includes creative sectors. In addition to this, Policy E3 sets out policy criteria to secure an appropriate quantum of affordable, shared and/or small business units in order to support specific

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					purposes i.e. to help start-up businesses. The Local Plan Key Performance Indicators (KPIs) will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report. The KPIs will monitor the loss/gain of employment floorspace and a number of employment and business related indicators. The supporting text has been updated to include reference to a well established network of artist studios, rather than listing individual studios to avoid the information becoming out of date.
E1/17	E1	Concern about the negative impacts of job/business losses and strategies for relocation and reprovion are unrealistic. A stronger commitment, monitoring and more information is required to manage displacement and ensure existing businesses are supported.	13	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. The jobs capacity figures are now expressed as new jobs. OPDC has updated the Industrial Land Review to demonstrate how no net loss of industrial floorspace would be achieved through the Local Plan, including reprovion of industrial floorspace in Old Oak. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable. Intensification will provide increased capacity to accommodate incompatible uses being relocated from Old Oak. Policy E2 has been amended to clarify the requirements for supporting businesses. Policies E1 and E2 also

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					support the delivery of workspaces for identified growth sectors which includes existing sectors which are important to the local economy. The Local Plan Key Performance Indicators (KPIs) will be subject to regular monitoring and this information will be publically available as part of the Authority Monitoring Report. The KPIs will monitor the loss/gain of employment floorspace and a number of employment and business related indicators.
E1/18	E1	OPDC should also utilise GVA to measure growth of industry in Park Royal.		Park Royal Business Group	Change proposed. Additional Key Performance Indicators have been added for total GVA. The Local Plan cannot control the businesses that take up the commercial floorspace created through development, therefore it will not be possible to measure growth in specific sectors as part of the planning process. However, future updates to the evidence base will be able to assess and analyse strategic changes in the local economy.
E1/19	E1, para 9.12	Applicants should provide more evidence to demonstrate the support provided to sustain existing businesses and social and community uses	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Change proposed. Policy TCC4 already seeks to protect existing social infrastructure facilities but Policy E2 has been amended to clarify the requirements for supporting existing businesses. The proposed Local Plan Key Performance Indicators (KPIs) also include a number of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	employment and business related indicators. The Local Plan KPIs will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report

E2: New Employment Floorspace

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E2/1	E2	Providing additional non SIL uses above SIL uses would not jeopardise the SIL use but continue to increase employment densities as part of intensification strategy.	1	DP9 (on behalf of A40 Data Centre BV);	No change proposed. The Mayor's London Plan sets out the strategic approach to promoting and managing industrial land, including defining which uses are appropriate within Strategic Industrial Locations (SIL). In line with the London Plan, hotel uses are not appropriate in SIL. OPDC's key priorities for SIL are to protect, strengthen and intensify the industrial area. Delivering high employment densities is not the overriding objective of SIL, it is supposed to provide a reservoir of land and floorspace/uses for broad industrial type activities. Therefore, Policy E1 requires all applications in SIL to be comprised of uses appropriate to this location. The Park Royal Intensification Study demonstrates that intensification is

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					deliverable and, as such, intensification will be supported wherever feasible and where it is comprised of appropriate uses. If intensification is not feasible, this should be demonstrated by the applicant.
E2/2	E2	Policies should be stronger in supporting intensification and allow flexibility for intensification proposals.		London Borough of Ealing	Change proposed. New industrial site allocations have been introduced, using information from the Park Royal Intensification Study. In addition to this, the Local Plan policies (P4, P5 and E1) support intensification of industrial uses within SIL where this is feasible.
E2/3	E2	Support policies promoting future growth sectors, particularly 'Med Tech' uses.	1	Deloitte LLP (on behalf of Imperial College)	Noted.
E2/4	E2	Policy E2 should set a quantum/target or ask for significant proportion of affordable workspace provision.	1	London Borough of Brent; ACAVA	No change proposed. E3 requires an appropriate quantum of affordable workspace which would be assessed on a case by case basis. This provides flexibility to determine the most suitable approach as, in some cases, the delivery of small business units may be more appropriate. OPDC may consider providing more detail on implementing this policy this as part of preparing an Affordable Workspace SPD. An SPD could be updated more regularly than a Local Plan document.
E2/5	E2	Provision of a Marketing Statement and evidence is inappropriate and not	1	DS2 (on behalf of Old Oak Park Limited)	Change proposed. The design of commercial premises must be fit for purpose and Policies E1 and E2 have been

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		necessary. Planning should not involve itself with the way in which developers inform the design of commercial premises			amended to reflect this. The policies require buildings to be well designed for their intended purpose having regard to identified future growth sectors. This will have to be demonstrated through a Design and Access statement.
E2/6	E2	Requirements in E2 are unlikely to incentivise intensification.	1	CBRE (on behalf of SEGRO)	Change proposed. Policy E3 now clarifies that proposals should deliver affordable, shared and/or small business units.
E2/7	E2	The design of mixed use (residential and commercial) development is critically important and should be covered in Policy E2.	1	CBRE (on behalf of SEGRO)	No change proposed. Policies D1, D4 and D6 already set out comprehensive criteria to assess design quality and approach.
E2/8	E2	Support providing a range of workspaces. This policy should also include reference to new employment space being designed to be flexible so that any development can be responsive to changing needs.	1	London Borough of Hammersmith and Fulham	Change proposed. Policy E1 and E2 have been amended and clarify that proposals must be well designed but also have regard to the need for flexibility.
E2/9	E2	Need explanation of how jobs will be created and who providers will be	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. New jobs will be created as new commercial floorspace is delivered in the area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
E2/10	E2	Policy on new employment floorspace should refer to the reprovision of existing businesses	13	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. Policy E2 has been amended to clarify the requirements for supporting existing businesses.
E2/11	E2	Support for new employment floorspace which has a range of tenure and size options	13	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. This is now covered in Policy SP5
E2/12	E2	All developments should help with the reprovision of employment floorspace, and policy should be amended to ensure small business and	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Change proposed. Policy E2 has been amended to clarify the requirements for supporting businesses and applies to all employment sites outside of SIL.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		existing/ potential occupiers are taken into account.		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
E2/13	E2	Policy E2 should set a quantum/target or ask for significant proportion of affordable workspace provision.	2	London Borough of Brent; ACAVA	No change proposed. E3 requires an appropriate quantum of affordable workspace which would be assessed on a case by case basis. This provides flexibility to determine the most suitable approach as, in some cases, the delivery of small business units may be more appropriate. OPDC may consider providing more detail on implementing this policy this as part of preparing an Affordable Workspace SPD. An SPD could be updated more regularly than a Local Plan document.

Policy E2: Supporting Small Business

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E3/1	E3	Should provide space for workspaces and particularly for start-ups, artists and makers.	1	ArtWest; Hammersmith Society	Noted. The Employment policies seeks to secure and a range of workspaces, including affordable, shared and small business units. Policy E1 and E2 also support the delivery of workspaces that help meets needs of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					identified growth sectors, including the creative sectors.
E3/2	E3	Support Policy E3	1	ArtWest	Noted. The objective to support small businesses is still reflected in the amended Policy E3.
E3/3	E3	Low cost or "sub-market" should be more clearly defined and should include more information on how this will be remain affordable over the long term		ACAVA	Noted. What is considered 'affordable' could vary by use and over time so more information would be required in order to define this clearly. OPDC may consider this as part of preparing an Affordable Workspace SPD which can be updated more regularly than a Local Plan document. The supporting text for policy E3 has been amended to clarify the arrangements for securing affordable workspace via a legal agreement.
E3/4	E3	Policy should be clearer on "appropriate locations" for affordable workspaces.		London Borough of Ealing	No change proposed. Policy E3 does not preclude any locations for affordable workspace. OPDC wishes to encourage the principle of this type of development and by identifying appropriate locations it may serve to weigh against delivery in other areas which may be acceptable. Any proposals within SIL would need to be in accordance with Policy E1.
E3/5	E3	Concerned about the requirement for the approval of workspace or studio providers and consider that rent and tenancy matters		DS2 (on behalf of Old Oak Park Limited); CBRE (on behalf of SEGRO)	Change proposed. The policy is seeking to ensure that any agreed or intended objectives will be met and effectively monitored, therefore some certainty is required about who and how the space will

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should not be controlled through the planning system.			be managed over time. Approved workspace providers would help provide evidence of this, however, the text has been amended to clarify that an approved Management Scheme could achieve the same objective. Supporting text to Policy E3 has also been amended to clarify that the arrangements for affordable workspace including the quantum, type, rent levels, management and timescales will be secured via a legal agreement. References to the 1954 Act have been removed.
E3/6	E3	Cost of capped rents will need to be accounted for in viability evidence		DS2 (on behalf of Old Oak Park Limited)	No change proposed. The Whole Plan viability study has tested the cumulative impact of the policies in the Local Plan. Policy DI1 makes it clear that, OPDC will appropriately balance the priorities for a range for contributions, this would include any requirements for affordable workspace. This would be assessed on a case by case basis.
E3/7	E3	The lack of detail on who will support small businesses makes this narrative unsound.		Friary Park Preservation Group	No change proposed. Policies SP5, E1 and E3 support the provision of small business units which can be used by small or start-up businesses. Applicants for planning permission will need to demonstrate how they are meeting these policies.
E3/8	E3	Support provision for small businesses	15	Hammersmith Society; Harlesden Lets; Grand Union Alliance, Wells	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				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	
E3/9	E3	Low cost/low rents are usually an essential ingredient for small businesses.	14	Hammersmith Society; Harlesden Lets, 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 E3 supports the provision of affordable workspace under a number of circumstances, including those offered at below market rents and if this involved the change of use of existing buildings, as long as all other relevant planning policies were met.
E3/10	E3	Policy should require a range of tenures. Management by an approved workspace provider is in conflict with policy requirements for the re-provision of existing employment workspace	13	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	Change proposed. The policy is seeking to ensure that any agreed or intended objectives will be met and effectively monitored, therefore some certainty is required about who and how the space will be managed over time. Approved workspace providers would help provide evidence of this, however, the text has been amended to clarify that an approved Management Scheme could achieve the same objective.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
E3/11	E3	Examples of artist studios in Old Oak area and their potential role in the future of Old Oak should be acknowledged.	13	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. The supporting text has been updated to include reference to a well established network of artist studios, rather than listing individual studios to avoid the information becoming out of date.
E3/12	E3	Concerned about the requirement for the approval of workspace or studio providers and consider that rent and tenancy matters should not be controlled through the planning system.		DS2 (on behalf of Old Oak Park Limited); CBRE (on behalf of SEGRO)	Change proposed. The policy is seeking to ensure that any agreed or intended objectives will be met and effectively monitored, therefore some certainty is required about who and how the space will be managed over time. Approved workspace providers would help provide evidence of this, however, the text has been amended to clarify that an approved Management Scheme could achieve the same objective. Supporting text to Policy E3 has also been amended to clarify that the arrangements for affordable workspace including the quantum, type, rent levels, management and timescales will be secured via a legal agreement. References to the 1954 Act have been removed.

Policy E4: Work Live Units

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E4/1	E4	Restrictive nature of Policy E4 is supported.		London Borough of Ealing	Noted.
E4/2	E4	Support E4.	16	ACAVA; Art West; Hammersmith Society; Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
E4/3	E4	Low value live-work units in high value areas will not be deliverable. Live-work units should be permitted in a range of tenures, within SIL, on the edge of SIL designations adjacent to residential areas, be allowed for residential reversion and	15	Old Oak Interim Neighbourhood Forum; 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,	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. This approach to protecting land for employment is consistent

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		identified as a potential meanwhile use		Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	with national policy guidance and the London Plan. Live work accommodation is intended to help provide affordable workspace for start-up businesses so the tenure should reflect this. Policies E4 and TCC9 do not preclude work-live units being proposed as meanwhile uses provided they satisfy the criteria within policy TCC9 and other relevant policies in the Local Plan.
E4/4	E4	Should include more policy criteria/detail related to how to manage noise and air quality in work live units, and the need for different tenures, number of bedrooms, open space, social infrastructure	13	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. As a minimum, the environmental performance criteria for these units (including air quality and noise) should be the same as residential units, but the measures necessary to achieve those criteria may have to be more robust. This has been clarified in the text. These environmental issues will be addressed on a site-by-site basis and controls imposed on planning permissions where necessary. Specific controls for issues such as operating hours will be considered on a case-by-case basis because the degree of control will depend on the circumstances of each case. Policy H2 will ensure that a wide range of housing options are available within the OPDC area, including a mix of different size homes. Live work

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					accommodation is intended to help provide affordable workspace for start-up businesses so the size of units should be driven by needs from this part of the market as would be assessed by E4 part a). The supporting text for E4 refers to measures necessary to ensure that work-live units support business activity and to avoid the units reverting to full residential use in the future.

Policy E5: Local Access to Training, Employment and Economic Opportunities

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E5/1	E5, Para 9.39	Clarity is required in relation to section 106 training, employment and opportunities obligations. There is the potential for requirements to be too onerous if not clearly defined	1	DS2 (on behalf of Old Oak Park Limited)	Change proposed. The supporting text has been amended to clarify that this meant the end use of the development. The policy and supporting text describe the principles which should be considered, but the detailed measures need to be developed by applicants as part of their Local Labour, Skills and Employment Strategy and Management Plans.
E5/2	E5	Support E5 but opportunities should be available to local people who live outside of the OPDC area	1	Royal Borough of Kensington and Chelsea	No change proposed. Policy E5 does not refer to relevant boroughs and therefore does not exclude local people who live outside of the OPDC area

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E5/3	E5	Support for local training, employment and economic opportunities. Existing employment opportunities should be retained in the local area and for local people. Emphasis should be given to supporting existing businesses, young people, start-ups and training	15	London Borough of Hammersmith and Fulham; Hammersmith Society; Harlesden Lets, 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 supporting text to Policy E5 includes detailed information on how LLSESMP should provide for local jobs as well as training and business opportunities. Policy E3 also requires an appropriate quantum of affordable, shared and/or small business units to support small and start-up businesses.
E5/4	E5	All developments should have a LLSESMP. Policy requirements should be clarified, expanded and strengthened to include maintaining job numbers and monitoring arrangements. Development should mitigate socio-economic, transport and environmental impacts	13	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. Major development is defined in the Glossary for the Local Plan. The major development threshold reflects the fact that LLSESMPs will only be effective where developments are expected to generate a sufficient amount of employment to justify a plan being agreed. However, policies E1 and E2 will help protect existing and deliver new employment uses and therefore will also make a general contribution to supporting the delivery of jobs in the area. The supporting text already makes it clear that an LLSESMP will be secured via a legal agreement, this would include monitoring measures.

10: Town Centre and Community Uses Chapter

TCC1: Locations for Town Centre Uses

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC1/1	TCC1	TCC1 part e) is not in conformity with the London Plan as it allowed Town Centre uses within SIL, leading to incremental erosion of SIL.	2	Ealing Council, Mayor of London	Change proposed. The policy for town centre uses in SIL has been revised to more closely align with the requirements of the London Plan - that being that uses should be small-scale walk-to services such as small creches and cafes.
TCC1/2	TCC1	Broadly support Policy TCC1	1	Royal Borough of Kensington and Chelsea	Noted.
TCC1/3	TCC1	The policy is not sound as no mention is made in Policy TCC1 of the need to assess potential impacts of town centre uses on neighbouring centres, particularly Harlesden, as indicated in the Retail and Leisure Needs Study (para 8.1.10).	13	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. The requirements for a Harlesden Enhancement Strategy were set out in the revised draft Local Plan Place policies for Old Oak South, Old Oak North and Willesden Junction and was referenced in the supporting text to Policy TCC3. However, OPDC concurs that these requirements would be clearer if included in Policy TCC1. The requirements for potential enhancements to Harlesden have therefore been relocated into this policy.
TCC1/4	TCC1	The only statement in Chapter 10 concerning the potential impact on Harlesden is made in TTC3(f) A Class Uses and supporting text 10.22 and 10.23. However, this policy and these text paragraphs	13	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,	Change proposed. The requirements for potential enhancements to Harlesden have been relocated to TCC1. The supporting text recognises that the RLNS identifies that Harlesden is likely to be most impacted by regeneration, but that there are also opportunities for the centre to capture spend from the new population and that these

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		refer to town centre uses in general and not to A-class uses specifically. This should be relocated to TCC1 and a statement about the nature of Harlesden town centre, its contribution to meeting the needs of existing residents, and its potential to play a role in and benefit from the developments in the OPDC area, as well as to be potentially negatively impacted by these developments should be made here		Jeremy Aspinall, Thomas Dyton	opportunities should be explored through the Harlesden Enhancement Strategy.
TCC1/5	TCC1	The general London Plan aim of “managed growth” for Harlesden should be included here, noting the commitment then of the London Plan to enhance the quality and diversity of shops and to safeguard traditional retail uses	13	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. Harlesden Town Centre is not within the OPDC boundary. While it is appropriate to make broad reference to the centre when referring to the Harlesden Enhancement Strategy, the planning policy for the future of centre should be set through LB Brent's Local Plan.
TCC1/6	TCC1	A clear statement is needed concerning what the potential damage to	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts,	No change proposed. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years,

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Harlesden of OPDC development might be across the range of town centre uses, thus in every TCC policy section, and what effective mitigation is required.		Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth. Enhancements to Harlesden are therefore likely to be focussed more on opportunities to capture growth rather than to mitigate impacts. Consideration would of course need to be had to the Section 106 tests. Regardless, OPDC does not consider it appropriate to fix not what sort of measures will be required to support Harlesden. There will be a need for flexibility to consider what measures may be required to mitigate any impacts.
TCC1/7	TCC1	Need a stronger consideration of how neighbouring areas will shape the plans for the OPDC area in respect of town centre uses	13	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,	No change proposed. The Retail and Leisure Needs Study factored in background growth and known planned expansions to town centres to inform the recommendations in the study.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	
TCC1/8	TCC1	A more detailed breakdown of potential commercial floorspace by location, including clusters, should be provided	13	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 place policies have indicative jobs targets, but there needs to be a degree of flexibility over which particular sector these jobs are provided within. The amount of floorspace within different B-class uses, D-class uses and within use class C1 will need to be treated flexibly by place and cluster. Site allocations also have indicative floorspace and jobs targets. Table 10.1 does set out indicative A-class use figures, based on current population projections and estimates of expenditure retention.
TCC1/9	TCC1, Figure 10.2	There is a discrepancy between Figure 10.2 and the Policies Map in the depiction of Old Oak High Street at Willesden Junction	1	Harlesden Neighbourhood Forum	Change proposed. The policies map has been altered to align with Figure 10.2.
TCC1/10	TCC1	The threshold for a Harlesden Enhancement Strategy should be 2,500 sq m as this is the level of development that the NPPF states should be the default level for impact assessment where a level has not been set.	1	Harlesden Neighbourhood Forum	No change proposed. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.
TCC1/11	TCC1	Care should be taken that sequential test in TCC1 does not allow proliferation of retail uses surrounding SIL.		London Borough of Ealing	Change proposed. Policy TCC1 has been amended to ensure the sequential approach does not undermine the function of SIL.

Policy TCC2: Vibrancy

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/1	TCC2	Support approach to controlling hot food takeaways	17	NHS Brent CCG, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, 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 Dyto	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/2	TCC2	Support seeking to control take-aways around schools as there is clear evidence linking the proliferation of fast food outlets to childhood obesity.	17	Mayor of London, London Obesity Leadership Group, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, 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	Noted.
TCC2/3	TCC2	Policy should consider increasing distance of control around primary schools to 400m	2	London Obesity Leadership Group, Hammersmith and Fulham Council	No change proposed. OPDC's Healthy Town Centre Study shows a 400m restriction around both primary and secondary schools would exclude almost all of the OPDC Area including the whole of the planned Old Oak Major Town Centre and therefore, the Old Oak Major Town Centre would not provide any hot food takeaways. This would be considered unreasonable and OPDC recognise the value of hot food takeaways to the economy, food choice and the need for a balanced approach in order to create a vibrant and healthy town centre

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/4	TCC2	Support policy seeking to limit over-concentration of hot food take-aways in centres	17	Mayor of London, London Obesity Leadership Group, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, 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	Noted.
TCC2/5	TCC2	Support requiring schemes to operate in compliance with the Healthier Catering Commitment scheme	2	London Obesity Leadership Group, Hammersmith and Fulham Council	Noted.
TCC2/6	TCC2	Policy should require organisations to operate in compliance with the Government's Food Buying Standards	2	London Obesity Leadership Group, Hammersmith and Fulham Council	Change proposed. The policy has been revised to encourage developers to operate in compliance with the Government's food buying standards.
TCC2/7	TCC2	Support approach to managing betting shops, pawnbrokers, payday loan stores and games arcades	3	Mayor of London, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/8	TCC2	Support Policy TCC2	1	Friary Park Preservation Group	Noted.
TCC2/9	TCC2	Consideration should be given to the impact on neighbouring town centres	1	David Craine	No change proposed. This is dealt with in TCC1.
TCC2/10	TCC2	The vibrancy policy is aspirational, with no evidence that schemes in North Acton can be activated, despite a cluster of high density buildings	13	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. Schemes in North Acton were implemented in advance of OPDC's production of the Local Plan.
TCC2/11	TCC2	TCC2c) seems to be missing a 'not'	13	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	Change proposed. The word 'no' has been deleted to make the policy effective.
TCC2/12	TCC2	This policy is not sound as it conflicts with TCC3f) and requirement to mitigate impacts on Harlesden. Additional policy text should	13	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. Impact Assessments are required where they meet the thresholds set out in Policy TCC1. There is not a need to repeat this requirement within this policy.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		be inserted, stating that on applying for change of use, assessment of the impact on neighbouring town centres will be required, and planning permission will be subject to that assessment.		Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC2/13	TCC2	Concerned that this policy will result in more concentration of these uses in neighbouring areas like Harlesden. This consequence needs to be mitigated against in consultation with LBB and Harlesden Neighbourhood Forum and this need for mitigation in neighbouring areas should be reflected in supporting text.	13	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. Brent Council is responsible for producing planning policy for Harlesden. Brent Council has its own policy to control hot food takeaways in Brent.

Policy TCC3: A-Class Uses

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC3/1	TCC3, Table 10.1	Table 10.1 should be included in the policy and proposals should be required to accord with this quantitative need.	1	Brent Council	No change proposed. As noted in the supporting text to Policy TCC3, the figures in Table 10.1 are estimates based on current development capacity figures, population projections and estimates of expenditure retention. The policy requires that regard is had to the most up-to-date Retail and Leisure Needs Study and its recommended distribution of A-class floorspace across the area.
TCC3/2	TCC3	Not sure how the 5,000sqm threshold for impact assessments has been arrived at. It is considered as a maximum the threshold should be 2,500sqm, reflective of the default standard in the NPPF.	14	Brent Council, 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 rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.
TCC3/3	TCC3	Support the broad aim to promote small units but should not stipulate a % target	1	Old Oak Park Ltd	No change proposed. OPDC considers it appropriate to set a clear target for the delivery of small units, to support the establishment of independents and start-ups and to add variety, vibrancy and vitality to

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					the centre. OPDC considers the approach sound, in that it is justified by evidence and the inclusion of a target is an effective way of securing delivery.
TCC3/4	TCC3, Table 10.1	Broadly quantitative provision figures in table 10.1	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/5	TCC3	Support threshold of 5,000sqm for Town Centre Uses Statement in Old Oak High Street major town centre	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/6	TCC3, para 10.22	Support wording in para 10.22 for greater need of scrutiny of town centre uses in emerging town centres.	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/7	TCC3	Support threshold of 2,500sqm for town centre uses elsewhere	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/8	TCC3	Support Policy TCC3	1	Friary Park Preservation Group	Noted.
TCC3/9	TCC3	Policy TCC3 is unsound (no reasons given)	1	Chris Billington	No change proposed. No reasons are given as to why the policy is considered unsound.
TCC3/10	TCC3	Do not support trying to have predominantly A1 uses in primary shopping areas. This can result in multiple vacancies. A more flexible approach should be adopted, as has been adopted for shopping parades in the St.	13	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,	No change proposed. OPDC considers it appropriate to specify that shop units should be focussed within primary shopping areas as these units tend to generate the greatest footfall and benefit from clustering, particularly for comparison trade. Neighbourhood Town Centres are much larger than shopping parades and in

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Quintin and Woodland Neighbourhood Plan.		Jeremy Aspinall, Thomas Dyton	accordance with the NPPF, OPDC considers it appropriate to define primary shopping areas and that these should be the focus for A1 shops.
TCC3/11	TCC3	The policy is not sound as it does not solely deal with A-class uses. It does not have an implementation strategy so is not effective. It is not positively prepared as it does not reflect evidence base and mention the potential negative impact on Harlesden in the RLNS	13	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. The elements dealing with 'town centre' uses which could also include non A-class uses has been relocated to Policy TCC1. OPDC considers that the elements that remain in the policy are sound and effective.
TCC3/12	TCC3	This strand of the policy should be relocated to TCC1 as it does not solely relate to A-class uses.	13	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. This has been relocated to Policy TCC1.
TCC3/13	TCC3	Special consideration should be given to the retail uses planned for the Willesden Junction place, Hythe Road and Scrubs Lane, which will	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. The specific occupiers of A1 premises within a use class cannot be controlled through the planning system, although the requirement to submit a vision statement as part of a Town Centre Uses Statement is so that OPDC and stakeholders

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		be in close proximity to Harlesden		Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	are able to broadly understand the types of uses that may be located within the OPDC area. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years, both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth.
TCC3/14	TCC3	The character of retail uses in Old Oak North and Willesden Junction could negatively impact on Harlesden Town Centre. As such a lower threshold for retail impact assessments in areas of Old Oak North should be incorporated	13	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 impact of a quantitative provision of over 60,000sqm of A-class floorspace has already been assessed as part of OPDC's Retail and Leisure Needs Study and this has shown that Harlesden Town Centre is set to benefit from the expenditure arising from residents and workers in Old Oak. OPDC requires schemes meeting the thresholds outlines in TCC1 to contribute, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Centre to explore how these benefits can be appropriately captured. OPDC does not consider it appropriate to lower these

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					thresholds. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments.
TCC3/15	TCC3	There is no policy that requires individual development proposals not to have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres. Policy should state that where it is likely to have a significant adverse impact on the vitality and viability of an existing centre it will be refused.	14	Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To make it clearer that the requirements of TCC1 are to avoid significant adverse impacts to OPDC's and the surrounding town centre hierarchy, this has been added to the lead in text to Policy TCC1. The Retail and Leisure Needs Study has looked at the impact of proposed levels of A-class floorspace provision on the surrounding town centre hierarchy and this has shown that the impact is likely not be adverse and that there are significant opportunities for surrounding centres to capture trade from the new population in the OPDC area. The NPPF requirement for impact assessments is to look at existing, committed and planned proposals and therefore, recognises the need to consider impacts cumulatively with other committed or planned proposals. Reference to this has been included in the supporting text.
TCC3/16	TCC3	If cumulative individual and smaller applications will have	13	Grand Union Alliance, Wells House Road Residents	No change proposed. While it was part of PPS4, the NPPF doesn't have a cumulative

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		a significant effect on Harlesden and other neighbouring centres, provision for an impact assessment across co-located or multiple-site applications should be made. Policy TCC1 should state that development proposals should not have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres.		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	impact test, requiring schemes below locally set impact assessment thresholds to submit impact assessments. There's a requirement for schemes over the default threshold to take account of cumulative developments in testing impact, but if the scheme is under the threshold in the first place, there is no cumulative trigger for undertaking an assessment. OPDC therefore considers the policy approach sound and consistent with the NPPF.
TCC3/17	TCC3	An early published version of the RLNS, in February 2016, concluded that there was a threat to Harlesden based on a total new A Class floorspace in the OPDC area of 64,100 sq metres up to 2037. The total new A Class floorspace has now risen to 68,500 sq metres in the latest published version of the Study (Nov 2016). This impact is now surely greater.	13	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 impact assessments in the Retail and Leisure Needs Study have been updated to assess the impact with the revised development projections within an addendum. However, the figures have subsequently been further updated in the Retail and Leisure Needs Study addendum and the figures have subsequently returned to 64,500sqm. The impacts on centres have been assessed and this has shown that there is significant potential for the surrounding hierarchy to capture trade from spend arising from the new population within the OPDC area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC3/18	TCC3	Need to set out how the diagrams showing active frontage are reflected in the estimates of town centre floorspace.	14	Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Active frontages do not solely relate to A-class uses - they can include other town centre uses. The annex of the Local Plan notes that figures (maps) in the Local Plan are indicative.

Policy TCC4: Social Infrastructure

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/1	TCC4	Need to address current problems with access to health before development can proceed.	1	Michael Hangyal	Change proposed. The duty to provide health facilities for existing residents falls on the local councils (in their role as public health providers), NHS and CCGs. OPDC's responsibilities through the Local Plan are to support any proposals to increase health provision to support the achievement of this. Further wording has been inserted into the policy to support the provision of such facilities, subject to them meeting local needs and subject to them according with other relevant policies.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/2	TCC4	Welcome the positively planned approach to social infrastructure	1	Mayor of London	Noted.
TCC4/3	TCC4	Need to provide space for nurseries and general support for D1 space.	1	Susannah Abeysekera	Change proposed. Further wording has been inserted into the policy to support the provision of new or enhanced social infrastructure facilities (including nurseries), subject to them meeting local needs and subject to them according with other relevant policies. Nursery space is recognised as a form of social infrastructure in Figure 10.5. OPDC's Infrastructure Delivery Plan sets out the requirements for nursery provision.
TCC4/4	TCC4	Policy only makes passing mention on co-location with housing and other social infrastructure, as per the GLA Social Infrastructure SPG	1	Ealing Council	No change proposed. The policy requires co-location where appropriate and feasible. Further supporting text sets out the rationale for this.
TCC4/5	TCC4	Suggest; 'in locations that are highly accessible to the populations that they serve...' The strategy for the provision of health services in particular may well mean that they are designed to serve people who travel further than the 'existing and new communities in the area'.	1	Ealing Council	Change proposed. Amendments have been made to the policy to incorporate this text.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/6	TCC4	The scale of social infrastructure burden on the Old Oak Park site is significant and disproportionate, but it is recognised that para 10.27 notes the potential for retrospective pooling contribution.	1	Old Oak Park Ltd	Change proposed. Further detail on the approach to retrospective pooling mechanisms has been included in SP10 and is already included in the relevant supporting text of the place policies.
TCC4/7	TCC4	Consider that a 2/3FE primary will be sufficient to meet needs and a 4FE primary will be too large and challenging to accommodate on the site. Not all schemes are unlikely to deliver 50% affordable housing and 25% family housing, meaning projections are worst case	1	Old Oak Park Ltd	No change proposed. OPDC's modelling shows the need for a 4FE primary school based on the policy requirements of the Local Plan, but the supporting text to Policy TCC4 recognises that the identification of appropriate on-site provision of social infrastructure is based on current assumptions on affordable housing, family housing and on the likely phased delivery and capacity of sites. As development proposals come forward OPDC will gain greater certainty about the required needs for social infrastructure, meaning the requirements for social infrastructure are likely to change over time. OPDC will monitor delivery on an ongoing basis, to ensure that the facilities proposed are the right size to meet needs. Any changes to the size requirements for the social infrastructure outlined would need to be agreed by OPDC and the relevant service provider.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/8	TCC4	Requirement for revenue funding is unnecessarily onerous and should be removed from the Local Plan	1	Old Oak Park Ltd	No change proposed. The requirement for revenue funding would only be in circumstances where an element of subsidy is necessary and appropriate. In the past, examples of this have been securing peppercorn rents for certain community facilities.
TCC4/9	TCC4, para 10.37	Requirement for large-scale social infrastructure should not be considered as a catalyst use unless the proposal is for social infrastructure not required by the Local Plan	1	Old Oak Park Ltd	Change proposed. This has been clarified in the supporting text.
TCC4/10	TCC4	Support and agree with the proposed approach to healthcare provision and expansion of existing facilities in early phases and delivery of one on-site health facility to meet the needs of development	1	HUDU	Noted.
TCC4/11	TCC4, para 10.35	Support the recognition for flexibility in the delivery of social infrastructure as outlined in para 10.35	15	HUDU, Hammersmith Society, Education and Skills Funding Agency, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/12	TCC4	Support approach to securing contributions, where necessary, towards management and maintenance costs	1	HUDU	Noted.
TCC4/13	TCC4	Need to consider a number of site options for the provision of the health centre, including within Old Oak South	1	HUDU	No change proposed. The provision of the health centre has been modelled against OPDC's development trajectory and the available sites have been assessed against criteria to derive the best site for the delivery of the health centre. However, the supporting text to the policy recognises that given the timescales over which the plan is proposed and the complexity of delivery, there is a need for a degree of flexibility in the approach to on-site provision of social infrastructure. It is therefore likely that the place specific requirements for schools and health facilities in particular will need to be kept under regular review, particularly for facilities identified within later development phases. In recognition of this need for flexibility, on-site facilities may be located on alternative sites if this is agreed by OPDC and service providers.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/14	TCC4	Emphasis of TCC4a) is broadly supported but it should recognise the need to support the transformation of NHS services where flexibility is required to make best use of its current estate and dispose of surplus sites for housing.	1	HUDU	No change proposed. The policy requires that any proposal for the loss of social infrastructure either requires its reprovision, or that the premises has been competitively marketed without success for other forms of infrastructure and that the loss of the facility would need result in a shortfall of provision for the population that it serves.
TCC4/15	TCC4	Support policy TCC4	15	Royal Borough of Kensington and Chelsea, Old Oak Interim Forum, Education and Skills Funding Agency, 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.
TCC4/16	TCC4	Text should acknowledge that it is essential that the needs of the OPDC area are met in full by new facilities within the area to ensure that there is no drain on the existing social	1	Royal Borough of Kensington and Chelsea	No change proposed. OPDC is not proposing that needs are met fully by new facilities and that opportunities should be taken to expand existing facilities if feasible. The most up to date requirements associated with this are included within OPDC's Infrastructure Delivery Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		infrastructure outside the OPDC area			
TCC4/17	TCC4	Broadly support TCC4a) but should be clearer as to what factors are considered to demonstrate that there is no longer a need and should require replacement facilities to be of the same or higher quality	1	Hammersmith and Fulham Council	Change proposed. Amendments have been made to require facilities reprovided to be of the same or higher quality. Additionally, the policy has been amended to set out the factors that are considered to demonstrate there is no longer a need.
TCC4/18	TCC4	Need to set out what factors would be considered to be unacceptable on the residential amenity of transport network	1	Hammersmith and Fulham Council	Change proposed. This policy strand has been removed as OPDC considers that this could give too much flexibility to allow for the loss of social infrastructure.
TCC4/19	TCC4	Do not support proposed location of the secondary school as it appears to be far from houses	1	Friary Park Preservation Group	No change proposed. The location of the school is close to the areas of planned housing development. The site was assessed against a number of criteria to derive the best location and this included proximity to housing, particularly family housing.
TCC4/20	TCC4	OPDC should specifically understand the need for places of worship rather than lumping them in with community facilities.	14	Diocese of London, 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	Change proposed. The supporting text has been revised to reference that the community hub should include faith space. The floorspace requirements for community space identified in OPDC's Social Infrastructure Needs Study and Infrastructure Delivery Plan acknowledges

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	that a variety of community spaces will need to be provided, including faith space.
TCC4/21	TCC4	Insufficient attention has been given to social infrastructure. In the previous draft of the Local Plan it had its own chapter whereas now it only has one policy.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Representations were received on the 1st draft Local Plan stating that there was a lot of repetition between social infrastructure policies. OPDC agreed and to avoid repetition, the requirements have been merged into one policy. OPDC considers the policy to be sound and to appropriately address the needs of all types of social infrastructure.
TCC4/22	TCC4	Existing social infrastructure provision is inadequate and needs to be considered together with planning for new residents. The local police station is closing, people are finding it difficult to register with their GP and other health services are being closed.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The provision of social infrastructure provision to meet existing needs is a matter for the service provider. However, OPDC has inserted policy wording that supports the provision of new or enhanced social infrastructure where it can be demonstrating it meets local needs and where it accords with other relevant planning policies. The supporting text clarifies that this includes support for facilities that better meet the needs of the area's existing population.
TCC4/23	TCC4	Need to safeguard land now for schools as they are demanding of space	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. The locations for schools have been identified in the Infrastructure Delivery Plan.

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				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/24	TCC4	In view of the increase in population, hospital services (Middlesex and Hammersmith), Health Centres, and GP services should be retained and expanded, and any closures of existing facilities prevented	13	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. How the NHS plans for health provision is ultimately a matter for the NHS, but as planning authority, OPDC would need to be satisfied that any loss of health facility would not result in a shortfall in provision for the population that it serves and that competitive marketing has been undertaken for a period of at least 12 months for alternative forms of social infrastructure without and appropriate offer being received.
TCC4/25	TCC4	Need to set out more clearly how community facilities will be paid for and how they will be managed	13	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. The plan needs to maintain a degree of flexibility about management arrangements. In relation to costs, the policy sets out that contributions will be sought from development, but in accordance with Policy DI1, alternative sources of funding may also be pursued.
TCC4/26	TCC4	Support the co-location of social infrastructure	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Noted.

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				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/27	TCC4	Concerned that given the infrastructure burden, provision of social infrastructure will be constrained	13	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. OPDC is working proactively with service providers to identify ways of securing funding for social infrastructure delivery. These mechanisms have been alluded to in the supporting text to Policy DI1. It includes measures such as direct funding from the service providers, which for instance is the case in relation to the EFA and delivering free schools.
TCC4/28	TCC4	More social infrastructure facilities have been added but the DIFS viability work has not been updated	13	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 Local Plan is supported by a Whole Plan Viability Study which assesses the deliverability of its policy requirements. OPDC's IDP identifies the costs of infrastructure, where known.
TCC4/29	TCC4	Social infrastructure as planned for by OPDC is not comprehensive, e.g. it does not include faith facilities or facilities specifically for children and young people,	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Change proposed. Text has been added to the supporting text to clarify that community space to meet the needs of development should provide a variety of functions including public toilets, halls for hire, youth space and faith space.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		and lacks precision within policy and certainty over long-term resourcing		Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/30	TCC4	Where there is no longer an identified use of the facility (a) i), the suitability of premises for other forms of social use (including community ownership) should always be considered. This should be included in the policy.	13	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. The policy has been amended to require marketing of the premises for alternative forms of social infrastructure in any scenario where the applicant is proposing to redevelop and not reprovide the facility.
TCC4/31	TCC4	OPDC are proposing limited allocation of CIL monies in the Preliminary Draft Charging Schedule	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's IDP identifies the need for new or enhanced social infrastructure to meet needs. If facilities are not identified on the Regulation 123 List this is to provide for the possibility for enhancements or new facilities to be secured through planning obligations and/or other funding sources.
TCC4/32	TCC4	Policy should provide an expectation of support for retention of existing social infrastructure, similar to the protection given to artist space in TCC5c)	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. The policy wording for TCC5c refers to 'supporting the retention' but then Policy TCC5c) cross-references to Policies E1-E3 in the employment chapter. These policies seek to ensure that new developments deliver appropriate

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	units/floorspace to enable current occupiers to relocate. Policy E2 requires robust engagement with current occupiers will be required; however, ultimately OPDC can only secure the floorspace and in accordance with Policies E1, E2 and E3, seek to ensure it is appropriate to potential existing occupiers. If there was not an interest in an artist filling the space, there is the ability for other occupiers within the B-use class to occupy the space. The social infrastructure policy does seek to protect social infrastructure facilities, but they differ slightly in that they are providing a service to meet needs. If there is no longer a demonstrable need for that service and it has been competitively marketed for alternative social infrastructure uses without success, there needs to be a policy mechanism to allow for its alternative use.
TCC4/33	TCC4	Should set out an expectation that planning gain will be available to support protection of existing and deliver new social infrastructure to ensure continuity of provision and support for existing and new residents	13	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. Planning contributions need to satisfy the S106 tests, being 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. It can therefore be used to provide new infrastructure or expand existing infrastructure to meet the needs of development. The need for this is covered in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					TCC4. In terms of better meeting the needs of existing residents, planning contributions cannot be reasonably used for this and the responsibility to meet current needs rests with the service provider; however, the policy has been revised to give stronger support for enhancements to existing or new social infrastructure facilities that meet the needs of the existing population.
TCC4/34	TCC4	Should set out a commitment to the timely construction of a local list of community and heritage assets in consultation with residents groups	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has undertaken consultation on a Local List of heritage assets. It is not clear what is meant by a list of community assets. Community groups can apply for premises to be listed as Assets of Community Value. Any application must be made to the host local authorities rather than to OPDC.
TCC4/35	TCC4, para 10.37	Fig 10.8 cited in para 10.37 could not be found.	13	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. This is an erroneous reference and should have referenced Figure 4.19

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/36	TCC4	Concern with the in-built flexibility in the approach to on-site health provision, NHS reduction in hospital beds, A+E closures and CCG proposals for one large health hub	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC must support the requirements of the CCGs. However, the policy recognises the need for flexibility and that alternative arrangements for the provision of social infrastructure that differs from the provision outlined in the Local Plan and IDP can be agreed with OPDC and the relevant service provider. In terms of existing provision, the policy has been revised to provide stronger support for social infrastructure facilities that help to better meet the needs of the existing population.
TCC4/37	TCC4	Additional health facilities should be built prior to or as new developments are approved	13	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. Facilities cannot be built in advance of approvals as there will not be sufficient planning contributions to pay for the expansions. Triggers for payments are agreed on a scheme by scheme basis within Section 106 agreements. CIL payments are made on commencement of each phase.
TCC4/38	TCC4	Existing schools are under pressure and there is little room for expansion. Some people are having to travel long distances to school	13	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,	Noted. The Education and Health Needs Study has factored current school provision and capacity into the modelling. OPDC is not the local educational authority and responsibility for meeting the needs of existing residents remains with the local authorities, but Policy TCC4 supports the provision of new and/or enhanced social

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	infrastructure facilities that better meet the needs of the area.
TCC4/39	TCC4	The secondary school allocated for North Acton may prove inadequate given that catchments are dynamic and change over time	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC needs to ensure that the needs of development are appropriately met within the OPDC area. However, in accordance with the Duty to Cooperate, OPDC has been and will continue to work with the surrounding local authorities to understand if there is a need for the OPDC area to also provide educational facilities that help to meet growth wider than solely within the OPDC area. However, at this stage no need has been identified.
TCC4/40	TCC4	Should identify sites for the delivery of schools that meet the needs of development in appropriate timescales	13	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 Local Plan does identify sites for the delivery of schools to meet the needs of development. Details on timescales are included in OPDC's IDP.
TCC4/41	TCC4	Further and higher education, linked to training and apprenticeships, should be provided for in TCC4.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. Further and higher education are identified as social infrastructure in Figure 10.5 and in the glossary and are therefore covered in the policy. Further education requirements are dealt with in the IDP, which identifies that the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	secondary school should provide further education facilities. higher educational needs are not dealt with explicitly as provision tends to operate on a more strategic basis, but the policy supports the provision of new or enhanced social infrastructure, which could include higher education facilities, subject to it meet needs in the local area and subject to it according with other relevant planning policy.
TCC4/42	TCC4	Should clarify how ACV listings will be applied to social infrastructure	1	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.
TCC4/43	TCC4	A site for the all-through school should be identified in the Plan so that the opportunity to deliver it in future is not lost.	1	Harlesden Neighbourhood Forum	No change proposed. It is too difficult to predict sites likely to come forward in the longer term. The supporting text identifies that a facility is required and that its delivery would be secured through future iterations of the Local Plan.

Policy TCC5: Culture and Art

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC5/1	TCC5	Support securing contributions towards public art	1	Canal and River Trust	Noted.
TCC5/2	TCC5, para 10.41	Para 10.41 references the Mayor's Cultural Strategy, which is now out of date	1	Mayor of London	Change proposed. This has been updated to reference the new Mayor's draft Culture Strategy.
TCC5/3	TCC5	Support Policy TCC5	2	Friary Park Preservation Group, ArtWest	Noted.
TCC5/4	TCC5	Support retention of existing and provision of new artist space, but provision needs to be affordable	14	ArtWest, 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	Noted. The need for affordable workspace is set out in Policy E3, which the policy cross-references.
TCC5/5	TCC5, para 10.46	Support para 10.46	1	ArtWest	Noted.
TCC5/6	TCC5	The recommendation from the Cultural Principles document for a Cultural Action Plan to be submitted by large developments should be included in the Local Plan	13	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. This requirement is included in TCC5.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC5/7	TCC5	Cultural facilities should be for the benefit of locals and Londoners rather than the international community	13	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. The Local Plan supports cultural facilities that meet identified needs. OPDC considers that the scale of land and the accessibility of the area means that cultural facilities could meet local and strategic needs. OPDC does not propose to set out that facilities that provide for the international community will not be supported. Any such use would however be likely to be a 'catalyst use' though and would therefore need to accord with the requirements set out in Policy TCC8.
TCC5/8	TCC5	Proposal for Science Museum on Cargiant site is unclear	13	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. This is a proposal from a developer and is not something required as part of the Local Plan. The Local Plan seeks to support proposals for cultural uses, but maintains flexibility over which specific cultural uses should be provided.
TCC5/9	TCC5	In addition to contribution to the public realm through S106 agreements, the principle of providing or contributing to public art should also be considered	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. This requirement is dealt with in the 'and/or the provision of public art' point.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		as an obligation		Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC5/10	TCC5	Where there is no longer an identified use of the facility (a) (i), the suitability of premises for other forms of social use (including community ownership) should always be considered.	13	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. It is not clear what is meant by 'social' use; however, community uses are in a separate use class and the Local Plan cannot require a cultural use (usually Use class SG or Use Class D2) to be marketed as a community use (Use class D1), before an alternative use can be considered. Community ownership of assets is dealt with in Policy D13.
TCC5/11	TCC5	Should include 'provide inclusive access in terms of age, ability/disability and income'	13	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. Inclusive access is dealt with in relation to all buildings and public realm through policies SP9 and D3.
TCC5/12	TCC5	Should use Section 106 money to support the growth of artists	1	ACAVA	No change proposed. The Local Plan identifies in Policy E3 that OPDC will look to secure low cost and/or open workspace and studios from developments. This will help support the growth of SMEs, including artists.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC5/13	TCC5	The plan should include space for an arts/community centre	1	ArtWest	No change proposed. The IDP identifies the need for two community hubs to meet the needs of the new population. There may be the potential to provide exhibition space as part of this or co-locate with artist space, in accordance with Policy TCC4. Policy TCC5 supports applications for new cultural space, subject to certain policy criteria.

Policy TCC6: Sports and Leisure

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC6/1	TCC6	The Plan is unsound as it does not have adequate reference to the need for playing pitches. The policy should be revised to make reference to the need for playing pitches to meet needs	1	Sport England	Change proposed. Reference has been inserted in Policy TCC6 for the need for development to protect existing and contribute towards new outdoor sports space, including playing pitches.
TCC6/2	TCC6	Do not agree with the proposed methodology and approach to sports centre provision	1	Sport England	No change proposed. OPDC considers the approach to be robust, based on evidence and effective for securing contributions from developers and proposes to maintain the approach set out in the policy.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC6/3	TCC6	Should reflect the wording of the NPPF para 74, which does not allow for the loss of sports facilities purely because it may be economically inviable.	1	Sport England	Change proposed. The wording on protection of sports and leisure facilities has been strengthened to align with the NPPF.
TCC6/4	TCC6	Wording should be changed so that requirement is not that the facility should be appropriately replaced, but is replaced with a facility of at least equivalent quality, quantity and accessibility as stated in the NPPF.	2	Sport England, Hammersmith and Fulham Council	Change proposed. The policy has been amended to reflect these requirements
TCC6/5	TCC6	Policy a)iii) is not an appropriate as it does not accord with the agent of change.	1	Sport England	Change proposed. This policy strand has been removed and replaced with the NPPF requirements around the provision of alternative sports provision.
TCC6/6	TCC6	Not relevant to repeat this here as the issue would be covered in transport policies and in policies dealing with amenity considerations	1	Sport England	Change proposed. OPDC agrees that these issues are covered through other policies and do not require repetition here.
TCC6/7	TCC6	Anything more than a 25 metre swimming pool is considered to be unnecessary when compared to other regeneration schemes and	1	Old Oak Park Ltd	No change proposed. The place policies and IDP identify that the starting point is to provide two sports centres, each with 1x25 pool, but equally, there could alternatively be one larger facility that provides a 50m pool and this could help to meet a deficiency in West London for a facility of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		other infrastructure priorities for the area			this size. The only current development precedent for the scale envisaged in Old Oak is the Olympics in East London, and this does have a 50m pool, so the point around precedents from other regeneration projects is considered to be unjustified.
TCC6/8	TCC6, para 10.51	The approach akin to Fulham Pools may be a potential way to deliver sports facilities, but it is unlikely to be viable until a substantial proportion of the area has been built out	1	Old Oak Park Ltd	No change proposed. The Fulham Pools model is run on a commercial basis but with concessions access and is viable. There would be a need to consider the appropriate timing to deliver the facility to ensure that there is a critical mass of people wishing to use the facility.
TCC6/9	TCC6	Support Policy TCC6	1	Friary Park Preservation Group	Noted.
TCC6/10	TCC6	Support policy TCC6c)iii)	13	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
TCC6/11	TCC6	TCC6 (a) should conform with TCC4 (a) and ensure that where there is no longer an identified use of the facility the suitability of	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. It is not clear what is meant by 'social' use; however, community uses are in a separate use class and the Local Plan cannot require a sport use (Use Class D2) to be marketed as a community

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		premises for other forms of social use (including community ownership) should always be considered.		Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	use (Use class D1), before an alternative use can be considered. Community ownership of assets is dealt with in Policy DI3.
TCC6/12	TCC6	Should include an expectation of support for the retention of existing facilities	13	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. The policy has been revised to give stronger protection to existing facilities, but the policy does recognise that if there are other facilities in the local area that meet needs, its loss may be acceptable.
TCC6/13	TCC6	Planning gain should be used towards protecting existing and delivering new sports and leisure facilities	13	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 policy identifies that planning contributions will be sought towards providing new sports and leisure facilities.
TCC6/14	TCC6	Should require new sports and leisure facilities to 'provide inclusive access in terms of age, ability/disability and income'	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed inclusive and accessible design is secured for all buildings and public realm through policy SP9 and DI3. The policy expressly requires public access for all ages to indoor facilities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	to ensure that there is non-membership access to those facilities.
TCC6/15	TCC6	Concerned about loss of existing affordable sports and leisure facilities to be replaced by less affordable commercial provision. Not for profit facilities should be given stronger protection	13	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. The policy requires that any assessment justifying the loss of an existing sports or leisure use demonstrates that there is suitable alternative provision to meet needs resulting from the lost facility in terms of capacity, access, quality, function and affordability
TCC6/16	TCC6	This policy could draw more effectively on existing evidence bases concerning the objective need for sports facilities across the neighbouring boroughs and wider region, especially for youth and teenagers for whom provision is lacking.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Local Plan supports the provision of new sports and leisure facilities and sets out how new development should contribute appropriately and proportionately to the provision of affordable and public access facilities.

Policy TCC7: Public Houses

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC7/1	TCC7	Object to Policy TCC7 as it is overly prescriptive and would not be able to effectively respond to changing market circumstances.	1	Citrus Group and Fuller Smith & Turner	Change proposed. The policy includes the same level of prescription as included in many other Local Plans. The London Plan supports the protection of public houses, whilst the NPPF supports the protection of community uses, so the inclusion of a policy is both in general conformity with the London Plan and consistent with the NPPF. OPDC considers that the policy approach does reflect market conditions. The policy has however been slightly amended in response to other comments from Citrus Group and Fuller Smith and Turner.
TCC7/2	TCC7	The marketing period should ideally only be for 6 months and at most 12 months, which as been adopted as an approach in other policy areas.	1	Citrus Group and Fuller Smith & Turner	No change proposed. 24 months has been adopted as an appropriate marketing period and has been adopted elsewhere in Local Plans. As an example, Lewisham requires marketing for 36 months, Greenwich and Brent require marketing for 24 months, Southwark and Hounslow for 18 months, LBHF for 12 months, RBKC has an outright resistance to loss of pubs. OPDC considers that marketing for 24 months strikes the right balance between recognising that there may not be a market interest in the continued use of the facility as a pub, with the need for an appropriate marketing period for a relatively specialist type of use. As noted in the supporting text, the competitive marketing requirements for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					public houses are longer than for other town centre uses in recognition of the smaller number of public house operators and as a consequence, the need for a longer marketing period to identify an appropriate operator.
TCC7/3	TCC7	“Competitively marketed” is not standard industry practice, doing so would adversely affect value and viability as the business would decline, staff would leave, it would be difficult to recruit etc	1	Citrus Group and Fuller Smith & Turner	No change proposed. Requiring marketing of the premises at appropriately set rent levels of standard industry practice and is a requirement set out in numerous Local Plans in response to numerous land uses.
TCC7/4	TCC7	“Appropriate publications” lacks definition and is poorly worded.	1	Citrus Group and Fuller Smith & Turner	No change proposed. It is inappropriate to specify the publications that an advert should be placed in as companies and publications might change, but the expectation would be on the applicant to market the property in publications that are well known and used by companies likely to be interested in acquiring public house premises.
TCC7/5	TCC7	Both “all reasonable efforts” and “all diversification options” are unreasonable and far too broad to constitute a reasonable policy. If marketing and viability evidence (as	1	Citrus Group and Fuller Smith & Turner	Change proposed. It is agreed that this policy strand potentially repeats strands covered elsewhere in the policy. It has been removed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		required by (a) and (d)) can be submitted, this part of the policy becomes redundant and should be removed.			
TCC7/6	TCC7	Should not refer to CAMRA guidance as this is one organisation with a specific focus. The test is not objective but subjective. It may be counter-productive to wider Development Plan objectives to enshrine what is essentially a wish-list into development control policy	1	Citrus Group and Fuller Smith & Turner	Change proposed. OPDC agrees that is not appropriate to necessarily refer to one interest group's publication. The key requirements in the viability test are in any case reflected in the other strands to the policy or elsewhere in the Local Plan.
TCC7/7	TCC7	The concept of "similar facilities" and "similar community environment" are too subjective and broad to form an appropriate policy test. This is a separate matter to a public house being unviable, and the policy as worded goes beyond a specific application for a specific site. There may be many other venues nearby, there may be none. The policy is too onerous as currently	1	Citrus Group and Fuller Smith & Turner	No change proposed. Public houses are a community facility and in accordance with the London Plan and NPPF (para 70), there is a need for OPDC to be satisfied that there are similar facilities in the local area that can provide for the needs of the population.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		worded, and is therefore not justified or sound			
TCC7/8	TCC7	Alternative uses could themselves generate a positive impact and one beyond that currently provided by a pub, on the character and vitality of an area through the demolition and redevelopment of the existing site of a pub rather than seeking to retain the built fabric. This strand of the policy is at odds with the other elements which seek to preserve the provision of a viable public house as opposed to the built form of the building.	1	Citrus Group and Fuller Smith & Turner	No change proposed. All three public houses have been identified as heritage assets through OPDC's Heritage Strategy. In accordance with Policy TCC7 and D8, OPDC would expect any proposal to either retain the building's fabric, or as much of it as feasibly possible. It is unclear how this strand of the policy is at odds. The policy provides policy guidance on public houses, there are some elements that relate to the pub's viability and some that relate to the character and heritage of the building as a pub.
TCC7/9	TCC7	This strand of the policy assumes that a definitive conclusion can be reached through a public consultation exercise. There is no guarantee that this would be the case and that the consultation exercise could capture the views of the majority of the local community who may have	1	Citrus Group and Fuller Smith & Turner	No change proposed. The response to the consultation would be treated on balance against the other considerations within this policy and other policy matters within the Local Plan and other development plan documents. Public consultations could take the form of door to door surveys in order to capture an appropriate cross-section of views and to avoid participation bias.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		no interest in the value of a public house.			
TCC7/10	TCC7	This strand of the policy is superfluous as there is already legislation that deals with this.	1	Citrus Group and Fuller Smith & Turner	Change proposed. It is agreed that this is superfluous as it is dealt through other legislation. This policy strand has therefore been removed.
TCC7/11	TCC7	Support protection of public houses	15	Mayor of London, Hammersmith and Fulham Council, 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.
TCC7/12	TCC7	The policy is not effective as it does not include enough detail on public houses	1	Friary Park Preservation Group	No change proposed. OPDC considers that the policy provides sufficient deal on the areas' public houses to make the policy effective. Further detail on the areas' public houses can be found in OPDC's Heritage Strategy.
TCC7/13	TCC7	Pubs policy should support the provision of new pubs as well as protection of existing	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. Provision of new A4 class floorspace is covered in Policy TCC3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC7/14	TCC7	There should be resistance of loss of pubs through an Article 4 direction	13	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. There is not considered to be a need because public houses have their own separate use class and demolition of public houses has been revoked from PD through legislative changes to the GPDO in 2017.
TCC7/15	TCC7	Should include greater detail on support for the retention of facilities, including planning gain funding and collaborative working with the boroughs for the Community Right to Build.	13	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. Planning contributions need to satisfy the S106 tests, being 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. They are unlikely to be appropriately used to support the protection of public houses. Community Right to Build is dealt with in Policy DI3.

Policy TCC8: Catalyst Uses

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC8/1	TCC8	Should identify the delivery of a football stadium	1	Rory Chapman	No change proposed. The Local Plan supports the potential for catalyst uses and Policy TCC8 identifies that sports stadia fall within this definition. Any proposal would need to accord with the requirements set out in Policy TCC8 and other relevant policies in the Local Plan and other Development Plan Documents and material planning considerations.
TCC8/2	TCC8	Agree with the approach set out in this policy in part but it could mean that all major developments need to submit a catalyst uses statement unless the policy clarifies it does not apply to site allocations, but always applies to sports/stadia facilities or other 'extraordinary' uses such as conference facilities. It should not apply to more regular employment facilities or social infrastructure	1	Old Oak Park Ltd	Change proposed. Wording has been inserted in the supporting text to TCC4 and TCC8 to clarify that the catalyst uses policy will not be applied to infrastructure identified in OPDC's IDP as this infrastructure is necessary to meet the needs of development and make it acceptable in planning terms. Wording has also been inserted in the policy to clarify that where it is a cluster of uses or buildings, the policy requirement for a catalyst uses statement need only be applied where the cluster of buildings that together create a single facility - i.e. a proposal for town centre uses as part of a high street would not need to submit a town centre uses statement unless they would be creating a shopping centre.
TCC8/3	TCC8	Reference should be made to impact assessments in the supporting text to TCC8	1	Royal Borough of Kensington and Chelsea	No change proposed. Impact assessments would only be required for retail, office or

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					leisure uses - some catalyst uses may not fall within these definitions.
TCC8/4	TCC8	Support Policy TCC8	13	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.
TCC8/5	TCC8	Would not support a sports stadium being delivered. The station interchange should suffice as a means of bringing people to the area.	14	Old Oak Interim Forum, 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 Local Plan does not provide support or objection to a sports stadium, but would require such a proposal to submit a Catalyst Uses Statement in accordance with Policy TCC8, and equally, would be assessed against other relevant development plan policy and other material planning considerations.
TCC8/6	TCC8, Table 10.2	Under 'complements the wider environment' should add that "It does not detract from the quality and use of open and green spaces, leisure and retail functions, as well as active frontages"	13	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	No change proposed. The policy requirements relating to open space are dealt with elsewhere in the Local Plan, in SP8 and EU1. Impact on leisure and retail is dealt with in Policy TCC1. Impact assessments would only be required for uses falling within retail, leisure or office

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	uses, in accordance with the NPPF. Active frontages are dealt with within the quantitative criteria under the objective to be 'part of a holistic offer'.

Policy TCC9: Meanwhile Uses

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC9/1	TCC9	Requiring mechanisms to allow meanwhile uses to occupy permanent developments will dissuade developers from proposing meanwhile uses.	1	Old Oak Park Ltd	Change proposed. The requirement is for the strategy to set out proposed approaches to supporting this. It is not a necessity that an occupier of a meanwhile use should be incorporated into new development proposals as it will not be suitable or viable in all cases. However, where appropriate, OPDC would expect landowners to try and support the potential for meanwhile uses to occupy permanent development, through mechanisms such as staggered rentals, business support and through right of first refusal. Wording in the supporting text has been revised to clarify that the provision of permanent space for meanwhile uses is not a requirement, but instead, is something that would need to be considered and mechanisms worked through with developers.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC9/2	TCC9	Should require meanwhile uses not to compromise longer-term plans. The policy as currently worded is too loose and could compromise longer term delivery.	1	Ealing Council	No change proposed. The need for meanwhile uses to not compromise the deliverability of key sites is outlined within strand a)iii).
TCC9/3	TCC9	Meanwhile uses should not form part of the consideration of a planning application at the initial stage as they are not relevant to the acceptability of the longer term development proposals.	1	Old Oak Park Ltd	No change proposed. OPDC wants to incentivise the optimised use of land, particularly where development will be phased over many years. OPDC therefore considers it important to understand the potential feasibility for meanwhile uses at application stage, so that a meanwhile strategy can be secured through planning agreement or condition.
TCC9/4	TCC9	Meanwhile uses should be a priority as many development sites will not be brought forward until post 2026	1	David Craine	Noted. OPDC is supportive of meanwhile uses subject to them according with Policy TCC9 and other relevant development plan policies and material considerations.
TCC9/5	TCC9, para 10.66	Support recognition of artists and potential meanwhile uses	1	ArtWest	Noted.
TCC9/6	TCC9	Support Policy TCC9	14	Hammersmith Society, Pentecostal City Mission, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC9/7	TCC9	The policy should be applied positively and impact on delivery of site allocations not used as an excuse by developers	13	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.
TCC9/8	TCC9	Proposals for meanwhile uses should also mitigate impacts on neighbouring town centres	13	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. If a meanwhile use was large enough and of the appropriate use class to warrant an impact assessment, this would be governed through the requirements outlined in Policy TCC1 and potentially through Policy TCC8. Other relevant policies in the Local Plan would also be applied to a meanwhile use.

TCC10: Visitor Accommodation

Comment reference	Section of Local Plan	Issue Summary	Number of consultees	Name of consultees who raised the issue	OPDC Response
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comment relates to		who raised issue			
TCC10/1	TCC10	Support policy TCC10	2	T.A.S.B. Investments Limited, A40 Data Centre B.V	Noted.
TCC10/2	TCC10	Reference to London's need for 40,000 bedrooms should be removed as it does not relate specifically to the OPDC area and is soon to be out of date	1	Mayor of London	Change proposed. Reference to the number of bedrooms has been removed from the policy. The figures have been updated with the new London Plan figures in the supporting text.
TCC10/3	TCC10	Broadly support the policy but it may impact on the supply of land available for other requirements in the Plan	13	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 policy did identify the need to not compromise the supply of housing, but this has been amended to require that proposals would not compromise the delivery of housing targets and would support the delivery of jobs targets, particularly within site allocations.

Policy TCC11: Night Time Economy

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC11/1	TCC11	Support policy TCC11	14	Mayor of London, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC11/2	TCC11	Policy TCC11's supporting text should reference the Mayor's 24-hour London vision which sets out his plan to turn London into a leading 24-hour global city and focuses on building a night-time culture	1	Mayor of London	Change proposed. Reference to this has been inserted in the supporting text.
TCC11/3	TCC11	The policy is not effective and should include more information about the night-time economy.	1	Friary Park Preservation Group	No change proposed. OPDC considers that the policy provides sufficient deal on the night-time economy to make the policy effective.
TCC11/4	TCC11	Planning applications for new night time economy uses need to be assessed in terms of their impact on existing night time economy uses in Harlesden. Applications that have a detrimental impact should be refused.	13	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 Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years, both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth. Policy TCC1, which would include night-time economy uses,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					requires Impact Assessments where schemes meet the thresholds outlined within the policy and which fall within retail, leisure and office uses.

11: Delivery and Implementation

Introduction

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI/1	Introduction	Do not support reference to potentially exceeding OPDC's homes and jobs targets	13	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. Annual homes targets are minimum targets. OPDC is also keen to support the delivery of significant employment opportunities. The wording recognises this would only be supported 'where feasible' and the planning policies would always be applied to assess the acceptability of any proposals.

Policy DI1: Balancing Priorities and Securing Infrastructure Delivery

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/1	DI1	Balance also needs to reflect site specific constraints and constraints affecting development feasibility and viability and other 'non infrastructure' planning obligations	2	Castlepride Ltd, Segro	Change proposed. This has been included in the policy, but text has also been 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/2	DI1	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	1	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.
DI1/3	DI1	Support Policy DI1a)	4	Mayor of London, TfL, Segro, David Craine	Noted.
DI1/4	DI1	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	1	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 D11 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
DI1/5	DI1	D1a) is a critical issue and this point should be referenced throughout the Local Plan	1	Old Oak Park Ltd	No change proposed. It is not felt necessary to repeat points continuously throughout the Local Plan. Policy D11 is a cross-cutting policy and by consequence, applies to all sites within the OPDC area.
DI1/6	DI1	Do not need the word 'appropriately'. Suggest its deletion	1	Hammersmith and Fulham Council	Change proposed. OPDC agrees and has removed the word from the policy.
DI1/6	DI1	Acknowledge that there are associated costs with	1	Hammersmith and Fulham Council	No change proposed. OPDC considers that the wording of the policy already

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development, however, these are essential in delivering the overarching Spatial Vision and bring benefits to the applicant. This balance should be acknowledged in the text.			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.
DI1/7	DI1	Measures to ensure balancing priorities and securing infrastructure delivery seem vague.	1	Friary Park Preservation Group	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.
DI1/8	DI1	The Plan is not sound because it has not set out a clear position on infrastructure costs	13	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. 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.
DI1/9	DI1	Concerned that there is not a clear approach to addressing the infrastructure funding gap and that this will result in greater reliance on developer	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		contributions and will compromise development quality		Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	funding of infrastructure and is not placing an over-reliance on developer contributions.
DI1/10	DI1	There is not a contingency plan if there are delays to infrastructure delivery or if infrastructure proves too expensive to deliver	13	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 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 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
DI1/11	DI1	The policy refers to an appropriate balance, but does not say what is appropriate or how it could be achieved	13	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,	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI1/12	DI1	Support DI1b)	13	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.
DI1/13	DI1	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	15	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 principles of sustainable development set out in the NPPF.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/14	DI1	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	15	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.
DI1/15	DI1	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	13	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/16	DI1	Support Policy DI1	1	Education and Skills Funding Agency	Noted.
DI1/17	DI1	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	15	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, 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.
DI1/18	DI1	The plan does not include a clear financial strategy for addressing the funding gap	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Study did not consider all funding sources or cashflow or growth/inflation.
DI1/19	DI1	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.	13	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 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 OPDC Board on the preferred sources of alternative funding and financing.
DI1/20	DI1	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	13	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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					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.
DI1/21	DI1	The deliverability of the plan is undermined by the lack of control of land.	13	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 DI4.
DI1/22	DI1	The current uses in the area impact of sales values, meaning there is less money for affordable housing and s106 contributions and that proposals are for higher densities than is acceptable	13	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,	No change proposed. It is not clear what is meant by this. Existing Use Values (EUVs) 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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Plan - specifically the Affordable Housing Viability Assessment and the Whole Plan Viability Study.
DI1/23	DI1	Recent schemes have not achieved affordable housing levels set out in the Local Plan, and have not provided adequate contributions to infrastructure	13	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.
DI1/24	DI1	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.	1	Old Oak Park Limited	No change proposed. The supporting text in Policy SP4, H2 and DI1 recognise this.

Policy DI2: Timely Delivery and Optimised Phasing

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI2/1	DI2, para 11.23b, Table 11.1	Reference to the delivery of the Elizabeth Line depot within the plan period should be removed.	1	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.
DI2/2	DI2, Table 11.1	List of landowners should differentiate between freehold and leasehold.	1	TfL	No change proposed. The table provides a high level summary and is not considered necessary to draw out freehold and leasehold arrangements.
DI2/3	DI2, Para 11.23	Need to recognise that long-term redevelopment of operational rail facilities would need to take account of future operational needs.	1	TfL	Change proposed. Wording has been inserted in the supporting text to acknowledge this.
DI2/4	DI2	Need to recognise that any de-designation of rail sites would be subject to standard industry procedures and consultation.	1	TfL	No change proposed. This process sits outside of planning policy.
DI2/5	DI2	Measures to ensure timely delivery and optimised phasing seem vague.	1	Friary Park Preservation Group	No change proposed. OPDC considers the policy limbs to be effective and specific.
DI2/6	DI2	This is an important policy for setting out the draft timetable for various parts of the site	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI2/7	DI2	Effective organisation and monitoring of this programme will be essential	13	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. Delivery will be monitored through OPDC's Annual Report, which includes OPDC's Authority Monitoring Report.
DI2/8	DI2	The policy should refer to minimising disruption during construction	13	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. This is dealt with in policies SP10 and in T8.
DI2/9	DI2	The policy gives excessive priority to early implementation which will compromise	15	Old Oak Interim Forum, Grand Union Alliance, Midland Terrace Residents	No change proposed. Schemes being implemented early would still need to accord with planning policy requirements

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		affordable housing and open space provision.		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	for open space provision and affordable housing.
DI2/10	DI2, Table 11.1	The table should include the size of each site, the anticipated density and the anticipated range of building heights	13	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. 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 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI2/11	DI2	Object to the policy as it will encourage ill- considered and speculative development	14	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	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.
DI2/12	DI2	Support Policy DI2	1	Education and Skills Funding Agency	Noted.
DI2/13	DI2	Approving schemes early results in negative consequences. OPDC have approved schemes recently that will have unacceptable levels of noise and air pollution	13	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. 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.

Policy DI3: Stakeholder Engagement and Being a Proactive Planning Authority

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/1	DI3	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.	13	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,	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
DI3/2	DI3	Support policy DI3 and commitment to regularly review and updates its Statement of Community Involvement	1	Association for Consultancy and Engineering (ACE)	Noted.
DI3/3	DI3	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.	13	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. 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/4	DI3, Figure 11.3	The Shield site is not in public ownership as HS2 have agreed to transfer land back to private landowners	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. The sites being acquired by HS2 for construction purposes will be shaded a separate colour.
DI3/5	DI3, para 11.31	Para 11.31 and 11.32 should reference RBKC and the other Western Riverside Waste Planning Authorities and the extent of cooperation with these bodies.	1	Royal Borough of Kensington and Chelsea	No change proposed. Reference to working with a wider network of local authorities is already 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.
DI3/6	DI3	Support Policy DI3	15	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.
DI3/7	DI3	Support Policy DI3e)	1	Hammersmith and Fulham Council	Noted.
DI3/8	DI3	OPDC are not being a proactive planning authority because they did not approve	3	Nicky Guymer, 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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		the Old Oak Neighbourhood Area as submitted and instead significantly reduced the boundary.			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
DI3/9	DI3	Support aspiration of policy but the tendency to date has been to ignore the views of the local authorities, community groups and residents	13	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.
DI3/10	DI3, para 11.31	OPDC has a duty to cooperate with local authorities, but this has not been upheld in respect of planning applications	13	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. The Duty to Cooperate does not relate to planning applications. In any case, neighbouring local authorities have been consulted on planning applications where appropriate.
DI3/11	DI3	Disappointed with OPDC's negative attitude to the formation of neighbourhood	13	Hammersmith Society, Wells House Road Residents Association,	No change proposed. As stated in Policy DI3 and paragraph 11.36 of the supporting text OPDC is committed to working with both

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		plans, to which the Local Plan merely pays lip service.		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	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.
DI3/12	DI3	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	15	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.
DI3/13	DI3	The policy is not effective because OPDC did not designate a neighbourhood area application as submitted.	17	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,	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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI3/14	DI3	Providing support to forums is a statutory requirement of a LPA so does not warrant having a policy.	13	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 referencing that support will be in place.
DI3/15	DI3	The policy is not effective because OPDC's engagement has been lacking including not sending regular newsletters to community groups	15	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/16	DI3	OPDC has not fulfilled its Policy DI3b or Statement of Community Involvement with required actions, in various ways.	1	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.
DI3/17	DI3, para 11.33b)	The Education and Skills Funding Agency should be referenced as an infrastructure provider in 11.33b)	1	Education and Skills Funding Agency	Change proposed. Work with the Education and Skills Funding Agency has been referenced in the supporting text.
DI3/18	DI3	Policy is not sound because OPDC has not actively encouraging participation from local community groups in planning applications and have not addressed their concerns	13	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 not consider this to therefore impact on the soundness of Policy DI3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/19	DI3	Welcome changes that were undertaken to the SCI, but these requirements have not been carried into the Local Plan	13	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 DI3 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 DI3 does set out that OPDC will keep this document under regular review.
DI3/20	DI3	Requirements outlined in the SCI have not been met, such as developer forums and proper early engagement from developers	13	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.
DI3/21	DI3	Text from the SCI on early engagement with communities should be transposed into the Local Plan	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI3/22	DI3	Policy should state that pre-application discussions between OPDC and developers and viability assessments will be published	13	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.
DI3/23	DI3	S106 contribution discussions should be published in advance of the conclusion of pre-application discussions	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC'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. OPDC requires Planning Obligation Heads of Terms to be submitted to meet OPDC's validation requirements in its Validation Checklist.
DI3/24	DI3	Policy is not sound as it does not set out how forums or community ownership arrangements will be supported and funded. It	14	Grand Union Alliance, Penecostal City Mission, Wells House Road Residents Association, Joanna Betts, Nadia	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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should state that CIL or S106 contributions will be considered as funding sources.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	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.
DI3/25	DI3	Should identify that CIL funding will be used to fund the implementation of neighbourhood plans	13	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.
DI3/26	DI3	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'	13	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		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 and negotiated border delimitations.			
DI3/27	DI3, para 1.33a)	Keen to work with OPDC on transport related issues in the area	1	West London Line Group	Noted.
DI3/28	DI3	Should set out that Assets of Community Value are a material consideration when determining planning applications	1	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.
DI3/29	DI3	Need to set out transparent information about ACV listings	1	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.
DI3/30	DI3	Should make it explicit that there will be a mechanism for warranted interventions to retain assets that are already	1	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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		in community ownership but are under pressure from developers			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).
DI3/31	DI3	Should support community asset ownership	1	Pentecostal City Mission	No change proposed. Support for community ownership initiatives is dealt with in Policy DI3.
DI3/32	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.	1	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.
DI3/33	DI3	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	1	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 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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					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).

Policy DI4: Planning Powers and Monit

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI4/1	DI4	The monitoring and enforcement of planning powers are vague	1	Friary Park Preservation Group	No change proposed. OPDC considers that the policy and supporting text adequately convey the powers at OPDC's disposal.
DI4/2	DI4	Support the principle of pre-application advice but there should be earlier public consultation with communities	13	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. 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
DI4/3	DI4	Support the need for engagement with a Place Review Group, but this should be re-constituted to include representatives from the local community	13	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.
DI4/4	DI4	Support preparation of other policy guidance including SPDs	13	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.
DI4/5	DI4	The KPIs are inadequate as they do not monitor things identified for monitoring in the IIA.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI4/6	DI4, para 11.43	para 11.43 should not just refer to major planning applications but to all planning applications	13	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. The text referring specifically to major applications to undertake pre-application engagement has been removed.

Appendix

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
A1/1	A1.45	The plan should recognise that Brent is and will continue to be an area of great diversity	1	Harlesden Lets	No change proposed. Recognition of the diversity of the area is set out in Figure A1.9.

	Figure A1.8	Figure A1.8 is missing the Pentecostal Church and nursery (2 Scrubs Lane) and NADI community centre and gym on Old Oak Common Lane.	13	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. The figure has been updated and reviewed to ensure it includes all known existing community facilities.
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Supporting studies

Affordable Housing Viability Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
AHVA/1	AHVA	Costs from the DIFS should be used to inform an appropriate area-wide appraisal assumption with the Deloitte notional site testing. Whilst it is accepted that any determination of the required infrastructure costs will not be final, the level of detail is considered sufficient to inform the AHVA, which is itself an area-wide study comprised of high level appraisal assumptions	1	Old Oak Park Ltd	No change proposed. OPDC is not proposing for all infrastructure costs to be borne through Section 106 or Community Infrastructure Levy. Recognition of this is clearly set out within Policy DI1 and within the DIFS. 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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					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.
AHVA/2	AHVA	The assumed sales values in the AHVA assume that the infrastructure has been provided but the AHVA does not take full account of the cost of providing the infrastructure.	1	Old Oak Park Limited	No change proposed. In accordance with National Planning Policy Guidance, sales values have been based on findings of comparable evidence of transacted new-build and re-sale properties in the area and are also based on a comparison of the sales values adopted on emerging developments in the area. They represent a range of values and are similar to those adopted in the Whole Plan Viability Study, also part of the evidence base for the Local Plan. Also in accordance with National Planning Policy Guidance, for an area-wide viability assessment, a broad assessment of costs is required. It includes the level of Community infrastructure Levy identified in the Preliminary Draft Charging Schedule. It cannot consider all the infrastructure costs as these will be identified through planning. The sales

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					values are considered to be appropriate on this basis.
AHVA/3	AHVA	The five notional site typologies tested by the AHVA are not reflective of the specific characteristics of the Local Plan area. The OOP site is not reflected yet represents approximately a quarter of all homes anticipated of being delivered within the Local Plan area.	1	Old Oak Park Limited	No change proposed. In accordance with National Planning Policy Guidance (NPPG), assessing the viability of Local Plans does not require individual testing of every site or assurance that individual sites are viable. In accordance with NPPG, and the Harmon Report on Viability Testing in Local Plans, notional site typologies can be used to determine deliverability at a policy level where they are representative of the whole area. The five notional sites test different EUVs based on existing land uses in the area, a range of densities that broadly accord with densities set out in the Development Capacity Study and sales values that were deemed appropriate by independent experts (Deloitte) on behalf of OPDC. This would accord with the requirements in the NPPG. It is also clear in the AHVA and in the Local Plan itself that individual sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
AHVA/4	AHVA	The viability of the notional sites is overstated because the full cost of providing the infrastructure has not been included.	1	Old Oak Park Limited	No change proposed. In accordance with National Planning Policy Guidance, for an area-wide viability assessment for policy purposes, a broad assessment of costs is required. The AHVA includes the level of Community Infrastructure Levy identified in the Preliminary Draft Charging Schedule. It cannot consider all the infrastructure costs as these will be identified through the development management process and depend on external funding available to support infrastructure delivery. Policy DI1 in the Local Plan identifies a key priority to secure additional public and private funding sources to support infrastructure delivery, in addition to developer contributions.
AHVA/5	AHVA	An additional site typology should be included in the AHVA representing OOP.	1	Old Oak Park Limited	No change proposed. As set out in National Planning Policy Guidance, assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable; site typologies may be used to determine viability at policy level. As stated in the AHVA and in the Local Plan, individual sites will require more detailed site and scheme specific viability analysis when

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					they come forward through the development management process.
AHVA/6	AHVA	The AHVA is based on a residual land value approach. No consideration has been given to alternative lead developer models.	1	Old Oak Park Limited	No change proposed. The National Planning Policy Framework states that viability should consider “competitive returns to a willing landowner and willing developer to enable the development to be deliverable.” The residual land value approach is the method commonly used by developers when determining how much to bid for land and involves calculating the value of the completed scheme and deducting development costs (e.g.: construction, fees, finance, Section 106 contributions, Community Infrastructure Levy and developers profit), and is appropriate for the majority of sites in the OPDC area. Furthermore, the residual land value approach is recommended by the Harmon Report on Viability Testing in Local Plans. It is clear in the AHVA and in the Local Plan itself that individual sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process. Alternative approaches such as lead developer models will be considered on a case by case basis.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
AHVA/7	AHVA	The AHVA adopts a GIA to NIA ratio of approximately 80%. This is considered too high for a strategic site and the result is to overstate the viability of the notional sites being tested.	1	Old Oak Park Limited	No change proposed. A gross to net ratio of 80% (allowing 20% core circulation) is a standard measure used in viability testing for Local Plan and Community Infrastructure Levy purposes. However, some sites will require more detailed site and scheme specific viability analysis when they come forward through the development management process to reflect multiple cores.
AHVA/8	AHVA	The proposed employment policies have a value impact and this affects the overall viability of development proposals, including the level of affordable housing that may be achieved.	1	Old Oak Park Limited	No change proposed. The Whole Plan Viability Study, included in the evidence base, has assessed all the Local Plan policies to identify those policies likely to impact on development viability, such as affordable housing, infrastructure (including Community Infrastructure Levy), environmental standards, open space requirements and employment policies (including affordable workspace and commercial floorspace at Old Oak Common Station). The conclusion of the Whole Plan Viability Study is that in the round, the policies contained in the Local Plan would be viable.
AHVA/9	AHVA	A 5% contingency allowance in the AHVA is not enough for a multi-phased scheme such as OOP.	1	Old Oak Park Limited	No change proposed. The high-level assumptions are based on comparable brownfield sites. However, applicants would be able to demonstrate higher

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					contingency requirements through robust evidence submitted as part of viability assessments.
AHVA/10	AHVA	Costs of remediation and decontamination at OOP are likely to be higher than those assumed in the AHVA	1	Old Oak Park Limited	No change proposed. The high-level assumptions are based on comparable brownfield sites. However, applicants would be able to demonstrate higher contamination requirements through robust evidence submitted as part of viability assessments.
AHVA/11	AHVA	The AHVA should be rerun talking the cost of infrastructure into account. In the first instance, this should be determined through the DIFS which already forms part of the Local Plan evidence base, but which can be supplemented through further dialogue between OOP Ltd and the OPDC as a result of the site-specific viability testing currently being undertaken.	1	Old Oak Park Limited	No change proposed. OPDC consider the viability work completed to date by OPDC is to the level of detail appropriate to inform policy work and in accordance with the requirements in National Planning Policy Guidance. It includes the level of Community Infrastructure Levy identified in the Preliminary Draft Charging Schedule and an assumed s106 contribution. Policy DI1 indicates that there will be other sources of infrastructure funding sought, not just developer contributions. As stated in the AHVA and in the Local Plan, individual sites will require more detailed site and scheme specific viability analysis when they come forward through the development management process and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					taking into account actual infrastructure and other requirements.

Development Capacity Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DCS/1	DCS	Support for inclusion of Cargiant site in Brownfield Register part 1	1	Old Oak Park Limited	Noted
DCS/2	DCS	Does not support local environment and surroundings.	1	Arnaud Demas	The Development Capacity Study has been developed to respond to sensitive locations as set out in Policy SP9.
DCS/3	DCS	Too many tall buildings proposed.	1	Ron Thorp	No change proposed. The Development Capacity Study does not set out building heights guidance. The approach to tall buildings is set out in Policy SP9, the Place policies and Policy D5.

Duty to Cooperate Statement

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DTCS/1	Duty to Cooperate Statement	Need to set out how you have engaged with the local councils	1	Scott Cawley	No change proposed. OPDC's Local Plan is supported by a Duty to Cooperate Statement, which sets out how OPDC has engaged with local councils and other public bodies.
DTCS/2	Duty to Cooperate Statement	Additional meetings should be included in the Duty to Co-operate report		Royal Borough of Kensington and Chelsea	No change proposed based on the activities set out in the response, as they contain inaccuracies. The Duty to Co-operate is a live document which is being updated at each stage. Where relevant the engagement activities have been updated/amended as appropriate.

Education and Health Needs Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EHNS/1	Education and Health Needs Study	The Education and Health Needs Study is unsound as it has not been positively prepared and fails to meet the infrastructure needs of the development	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. The Education and Health Needs Study outputs have been updated and incorporated into a new Social Infrastructure Needs Study.
EHNS/2	Education and Health Needs Study	Current schools operate with only a small surplus so will require expansion to accommodate growth envisaged. Further feasibility work	17	Brent Council, Ealing Council, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents	Change proposed. The Education and Health Needs Study has been updated and incorporated into a new Social Infrastructure Needs Study. Assumptions about surplus capacity have been revised in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should be undertaken to ascertain a school's potential for expansion		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, Harlesden Neighbourhood Forum	discussion with the boroughs. Potential expansion projects have been removed.
EHNS/3	Education and Health Needs Study	Should undertake further engagement with CCGs to ensure estimates of need and strategies for meeting this are as accurate as possible	1	Ealing Council	Noted. Further discussions have been undertaken with the NHS and CCGs to ensure consistency between OPDC's new Social Infrastructure Needs Study and their strategies.
EHNS/4	Education and Health Needs Study	The Education and Health Needs Study uses a GLA methodology for calculating child yield, which generates too high a child yield.	1	Old Oak Park Ltd	Change proposed. The modelling has been updated based on the GLA child yield calculator v2 high density scenario.
EHNS/5	Education and Health Needs Study	The modelling assumptions for child yield should be amended as follows: - Reconsidering the sample sites used – outer London boroughs such as Brent are not a reasonable representation of what the future urban form will be for this area. - Adjusting the age splits for younger children to take account of	1	Old Oak Park Ltd	Change proposed. The modelling has been updated based on the GLA child yield calculator v2 high density scenario, to better reflect the character of future development at Old Oak. Assumptions have also been made within OPDC's modelling for specialist housing types and a related reduction in child yields for these typologies.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		<p>the fact that flatted developments have a higher proportion of pre-school children relative to school aged children</p> <ul style="list-style-type: none"> - Allowing for normal levels of vacancies (the model assumes 100% occupation at all times) - Allowing for specialist housing (student, elderly, build to let) and their particular occupation characteristics, which are likely to reduce the child yield 			
EHNS/6	Education and Health Needs Study	Developer contributions may not be sufficient to fund required off-site expansions of education facilities.	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Noted. Policy DI1 identifies that OPDC will seek to secure alternative funding sources as required to secure the delivery of infrastructure, but OPDC will negotiate s106 contributions in accordance with the S106 tests and is also progressing a CIL charging schedule for the area.
EHNS/7	Education and Health Needs Study	The Education and Health Needs Study and Infrastructure Delivery Plan are not clear as to when off-site expansions of education facilities are required.	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. The new Social Infrastructure Needs Study has been produced through engagement with relevant service providers. Any use of off-site capacity has been agreed in advance of the finalisation of the study. Off-site expansion requirements are appropriately reflected in the IDP.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EHNS/8	Education and Health Needs Study	The Education and Health Needs Study needs to better understand and model mental health needs	1	Health and Wellbeing Board - London Borough of Ealing	Change proposed. The new Social Infrastructure Needs Study has incorporated modelling of the space required for primary and community mental health services.
EHNS/9	Education and Health Needs Study	Recognise that school planning is complicated and mechanisms should be in place to ensure continued dialogue between OPDC and the Council as the masterplan progresses	1	Hammersmith and Fulham Council	Noted. OPDC is committed to continued dialogue with the local education authorities to plan, monitor and manage the need for new school places during the Plan period.
EHNS/10	Education and Health Needs Study	Policy does not make reference to choice in school ie. faith schools or provision for children with special needs. This should be addressed	1	Diocese of London	Change proposed. Figure 10.5 has been updated to identify the need for special educational needs as part of education provision. Faith (and single sex) schools sometimes have restrictions around access for no-faith members and therefore could limit their ability to meet the needs of the development.
EHNS/11	Education and Health Needs Study	It is better to have an even number of forms of entry for curriculum planning purposes. 8FE is therefore better than 9FE	1	Diocese of London	Noted. However if the need is for an odd number of form entries, that it what must be provided for.
EHNS/12	Education and Health Needs Study	There needs to be mixed affordabilities for nursery provision. Need nursery spaces in schools. Why are only private nurseries mentioned?	1	Diocese of London	Change proposed. The new Social Infrastructure Needs Study assumes that some early years/nursery space will be provided within primary schools as well as in privately run nurseries.
EHNS/13	Education and Health	Should make mention of Church of England as a school provider.	1	Diocese of London	No change proposed. Faith (and single sex) schools sometimes have restrictions around

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	Needs Study				access for no-faith members and therefore could limit their ability to meet the needs of the development. OPDC would therefore need to assess the merits of this sort of provision on a case by case basis. OPDC's starting point would always be to support facilities that best meet the needs of the populations they serve.
EHNS/14	Education and Health Needs Study	Would be better to deliver primary schools as 2FE schools rather than 4FE to give them more of a community feel.	1	Diocese of London	No change proposed. Delivery of social infrastructure facilities at scale delivers the greatest efficiencies and best value for money. The Social Infrastructure Needs Study recommends that a 4FE primary school is a suitable model to adopt based on other precedents in London.
EHNS/15	Education and Health Needs Study	It should be recognised that school provision will need to be reappraised if housing figures change	13	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. This is already recognised in the supporting text to Policy TCC4.
EHNS/16	Education and Health	The policy is silent on early years provision and nursery provision, which also need to be considered	13	Hammersmith Society, Wells House Road Residents Association,	No change proposed. Early years provision and early years provision requirements have been modelled in the Social Infrastructure

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	Needs Study			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	Needs Study and are set out in OPDC's IDP and are identified as a type of social infrastructure in Figure 10.5.
EHNS/17	Education and Health Needs Study	On-site health provision should be provided in two health centres rather than one large hub.	13	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 must accord with the requirements for facilities provided by the CCGs. National policy set out in the NHS General Practice Forward View supports the provision of primary care at scale, including larger practices and/or more joined up networks of GPs that can offer a wider range of services to patients, including extended opening hours. The CCGs in NWL support the delivery of one larger health facility. However, the supporting text does recognise that if situations change, alternative arrangements for on-site social infrastructure can be made if approved by OPDC and the relevant service provider.
EHNS/18	Education and Health Needs Study	Have not considered social care needs as part of healthcare provision.	14	HU DU, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Change proposed. The new Social Infrastructure Needs Study has incorporated modelling of the space required to provide social care services.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EHNS/19	Education and Health Needs Study	Concern that off-site healthcare provision in early phases is in facilities that are already under strain.	13	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 CCGs have identified that the new primary care facility at Central Middlesex Hospital which opened in Spring 2018 has additional capacity and that the size of Hammersmith Centre for Health and Willesden Centre for Health and Care can be expanded in order to increase the capacity of primary care at those sites.
EHNS/20	Education and Health Needs Study	The early years needs are met through 5 super nurseries. Sites should be identified for their delivery.	13	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. The Social Infrastructure Needs Study and the IDP outlines the sub areas for 3 of the 4 super-nurseries.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EHNS/21	Education and Health Needs Study	Population growth needs to be broken down by age band	1	NHS Brent CCG	Change proposed. This has been provided in the new Social Infrastructure Needs Study.
EHNS/22	Education and Health Needs Study	The report needs to clarify that the proposed NHS approach is for one central health hub with one or two spokes	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study makes it clear that this is the CCGs' preferred approach.
EHNS/23	Education and Health Needs Study	It is not clear if the size of facility proposed will also provide adequate space for social care, not just primary care.	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive floorspace requirements. This makes assumptions for space required to provide social care.
EHNS/24	Education and Health Needs Study	If the option for Mitre Wharf to provide the health facility was pursued, this would impact on healthcare provision in North Kensington	1	NHS Brent CCG	No change proposed. The Mitre Wharf site was assessed and was not identified as the most appropriate location for the health hub and was therefore discounted.
EHNS/25	Education and Health Needs Study	The study does not capture all the primary care practices close to OPDC's border.	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has mapped all known primary care practices close to OPDC's border
EHNS/26	Education and Health Needs Study	Due to changes in the way primary care is being delivered now and will continue to develop over the duration of the Local Plan, due consideration needs to be given to the wider primary care workforce, including nurses, health care	1	NHS Brent CCG	Noted. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive facility requirements. The Local Plan's policies support the provision of affordable housing that would allow the primary care workforce to access housing in the local area. Policy SP5 supports the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		assistants and associated health professionals.			provision of new jobs across a range of employment sectors and skills levels.
EHNS/27	Education and Health Needs Study	Consideration has been given to the capital costs of delivering infrastructure but not to the revenue costs	1	NHS Brent CCG	No change proposed. NHS England is responsible for allocating NHS revenue funding from Government to provide health care for the growing population using a weighted population formula. However, the Local Plan does identify that where necessary and viable, OPDC will look to secure contributions from development proposals towards management and maintenance costs.
EHNS/28	Education and Health Needs Study	It is unclear what the methodology has been to arrive at a need for acute beds	1	NHS Brent CCG	No change proposed. The NHS has undertaken a strategic review of acute bed needs in West London and has confirmed that there is no need for additional acute bed provision arising from development within the OPDC area.
EHNS/29	Education and Health Needs Study	Need to consider wider health and well-being impacts such as access to green space, access to employment and encouraging walking and cycling	1	NHS Brent CCG	No change proposed. These issues are dealt with through a number of policies across the Local Plan.
EHNS/30	Education and Health Needs Study	The Study does not adequately reflect the final, published STP and the reference to patient list sizes and primary care space per GP in sub-section 5.3 does not support	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive floorspace requirements and no longer refers to number of patients or primary care space per GP.

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		the aspirations of the Five Year forward view.			
EHNS/31	Education and Health Needs Study	Basing facility size on list size per GP and GP numbers is an outdated model and references should be removed throughout Section 5.	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive floorspace requirements and no longer refers to number of patients or primary care space per GP.
EHNS/32	Education and Health Needs Study	Reference should be made to St Charles Centre for Health and Wellbeing and delivery of a primary care centre at Central Middlesex Hospital in 2018.	1	NHS Brent CCG	Noted. The new primary care centre at Central Middlesex Hospital and St Charles Centre for Health are referenced in the new Social Infrastructure Needs Study.
EHNS/33	Education and Health Needs Study	Table 17 needs to be updated with current position and list sizes. A statement is needed in respect of patient choice and the opportunity for patients to continue to choose which GP practice they register with.	1	NHS Brent CCG	Change proposed. The table has been updated in the new Social Infrastructure Needs Study with the current position and list sizes. A statement regarding patient choice has been included in the new Social Infrastructure Needs Study.
EHNS/34	Education and Health Needs Study	The study needs to be revised in terms of its assumptions on the use of historic estimates for future projections and the lack of individual borough housing growth built into the assumptions, the use of surplus capacity within schools and further work is required to	1	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. Following discussions with the boroughs, the new Social Infrastructure Needs Study does not rely on off-site expansion of existing schools. The advice from the Boroughs is that off-site existing primary schools can meet the needs from the development in phases 1 and 2 without needing to expand. The Early Years

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		investigate the feasibility of increasing the capacity of identified schools and to investigate need for early years, pre-school and SEN provision			and Education chapters specifically address SEN needs.
EHNS/35	Education and Health Needs Study	Table 10 of the Study (Para 4.5) should be clarified so that it is clear which schools are earmarked for expansion and which are being identified for use of surplus places	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. This has been clarified in the new Social Infrastructure Needs Study, which does not rely on off-site expansion of existing schools.
EHNS/36	Education and Health Needs Study	Issues/concerns regarding identified schools in LBHF, Brent and Ealing area. Further planning work will be necessary on each of these sites in order to establish their capacity for development and additional engagement with OPDC before these plans are finalised.	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. Following discussions with the boroughs, the new Social Infrastructure Needs Study does not rely on off-site expansion of existing schools.
EHNS/37	Education and Health Needs Study	Other changes proposed to the study to address issues raised and to clarify the current position of the boroughs	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. Other issues have been addressed through the production of the new Social Infrastructure Needs Study.
EHNS/38	Education and Health Needs Study	Not clear from the study whether there will be sufficient outdoor space for play in the commercial nurseries	1	Diocese of London	Change proposed. Wording has been inserted in the new Social Infrastructure Needs Study to identify that the size requirements identified for the facilities incorporated adequate provision for play space

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EHNS/39	Education and Health Needs Study	Support the production of the Education and Health Needs Study and consider it to be positively prepared and justified.	1	Education and Skills Funding Agency	Noted.

Future Employment Growth Sectors Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
FEGGS/1	Future Employment Growth Sectors Study	Query the forecast decline in motor trades as unduly pessimistic, and wonder if Park Royal could be promoted as a hub for Connected Autonomous Vehicles.	1	Park Royal Business Group	No change proposed. The Future Employment Growth Sectors Study considered a range of data sources, including the GLA and Cambridge Econometric employment forecasts, to try and understand how sectors might change. However, the Local Plan will cover a 20 year period so it includes flexibility and does not restrict the possibility for motor trades to grow in

Grand Union Canal Massing Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
GUCMS/1	Grand Union Canal Massing Study	Concern that study will be exploited by developers as a minimum standard for development, ignoring context.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement provides sufficient clarity regarding the role of the statement and guidance.
GUCMS/2	Grand Union Canal Massing Study	Study methodology is using incorrect ratios from Urban Design Compendium. Ratios for "square/very wide street" should be used instead of "streets".	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement uses the correct ratios.
GUCMS/3	Grand Union Canal Massing Study	Concern that diagrams in the study will encourage developers to build right up to boundary of the canal, not deliver space for a liner park, and create a canyon effect.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement provides sufficient clarity regarding the role of the statement and guidance.
GUCMS/4	Grand Union Canal Massing Study	Precedent of canal adjacent to Kensal Green Cemetery is a good precedent for benefits of widening the canal corridor.	1	The Inland Waterways Association-Middlesex Branch	Noted.
GUCMS/5	Grand Union Canal Massing Study	Minimum towpath width of 8.5 metres is needed, allowing for separation of cycle path from pedestrian footway and appropriate green verge.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. The proposed width of southern towpath is set out in recommendations of OPDC's Public Realm, Walking and Cycling Strategy. This reflects its transport role and local context.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
GUCMS/6	Grand Union Canal Massing Study	The statement fails to consider the unique character and qualities of the canal corridor and its often asymmetric sections, as well as its range of typical level differences, all of which should inform the level of enclosure in the first instance. Overall, the statement is not considered to be helpful or appropriate.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement provides appropriate information to informal general heights along the Grand Union Canal.

Gypsy and Traveller Accommodation Assessment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
GTAA/1	GTANA	OPDC's GTANA is in broad agreement to Ealing's own findings in the 2013 GTANA refresh.	1	Ealing Council	Noted.
GTAA/2	GTANA	LBHF and RBKC are jointly responsible for a Traveller site at Stable Way and that the two Councils have completed a Joint GTANA (Dec 2016). The study applies the PPTS definition of Travellers and concludes that the total accommodation needs across the two boroughs, LBHF and RBKC, is 9 pitches to 2030. This needs to	1	Royal Borough of Kensington and Chelsea	An addendum has been produced to assess the capacity in OPDC's area to help meet these needs

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		be acknowledged and considered as part of the OPDC GTANA.			

Heritage Strategy

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
HS/1		Heritage strategy should be updated to take account of the refurbishment of Former Railway Institute building	1	Raban Goodhall Ltd	No change proposed. OPDC considers the information presented in OPDC's Heritage Strategy to adequately reflect the current quality of the Former Railway Institute.
HS/2		Wells House Road should be listed as a community asset and designated as a conservation area	13	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Sharon Hayward, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Hammersmith Society	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. Conservation area designations result in their areas becoming 'designated heritage assets'. Designations are a statutory process governed by legislation and Historic England Guidance. Conservation areas must demonstrate local historic and/or architectural significance. Local refers to the OPDC area. The Heritage Strategy did not identify Wells House Road as a potential conservation area based on an assessment of the heritage significance of the area. However, the Strategy does propose the street to be a Local Character Area. This is an OPDC specific designation that helps to identify the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					area as a 'non-designated heritage asset'. The Heritage Strategy notes that 'Its character does not prevent (or place any special requirements on) domestic extensions or alterations, nor does it prevent development in its setting.' Assets of Community Value are nominated by community groups and designated by the local Borough. Once designated, ACVs can be considered as material considerations in planning decisions.
HS/3		Consideration should be given to the assessment of the settings of other designated heritage assets outside the OPDC area.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC does not consider it appropriate for OPDC's Heritage Strategy to access the settings of assets outside of the OPDC area. This information is provided by the boroughs' heritage guidance documents. Policy D8 has been amended to conserve and enhance heritage assets and their settings. This would include assets and their settings outside of the OPDC area.
HS/4		The creation of a Local List is welcomed and should be mapped. There are errors in the existing local list and statutory list. Consideration should be given to locally listing other assets such as Cross of Sacrifice War Memorial at Acton Cemetery	1	London Borough of Hammersmith and Fulham	Noted. Consultation and adoption of OPDC's Local Heritage Listings was carried out in 2018. This addressed errors on the list and included the Cross of Sacrifice War Memorial at Acton Cemetery.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
HS/5		Some of the Character Areas need further assessment related to townscape and relationship to the canal and/or open space and future identity.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the assessment of Character Areas within the Heritage Strategy to be appropriate to the role of a supporting study to OPDC's Local Plan. Further assessment of proposed heritage assets will be carried out in their designation, including conservation areas.
HS/6		The status and the nature of other buildings of local heritage interest and Areas of local character are unclear. The rationale for this additional layer of heritage designation has not been fully explained. The selection criteria for this designation needs further explanation.	1	London Borough of Hammersmith and Fulham	No change proposed. Consultation and adoption of OPDC's Local Heritage Listings was carried out in 2018. This included the selection criteria for the Local Heritage Listings and the rationale for two components of the listings.

Integrated Impact Assessment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
IIA/1	IIA	The Local Plan and IIA should have tested alternative options for the capacity of homes and jobs the area could deliver, particularly a lower capacity. Hammersmith and Fulham assessed lower capacity	16	St Quintin and Woodlands Neighbourhood Forum, Hammersmith Society, Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts,	No change proposed. Government guidance advises that only reasonable alternatives to proposals should be considered. NPPG Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		alternatives in their Local Plan prior to OPDC's establishment, so OPDC should also have tested lower capacity alternatives.		Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	<p>developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.”</p> <p>The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>appropriate to test lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable.</p> <p>It should be noted that LBHF's Issues and Options consultation was undertaken in advance of the consultation on and publication of the Mayor's Old Oak and Park Royal Opportunity Area Planning Framework and in advance of the publication of the London Plan (2015).</p>
IIA/2	IIA	Inadequate consultation was undertaken on the IIA scoping process	13	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 Scoping consultation for the IIA was carried out in accordance with Regulation 13(5) of The Environmental Assessment of Plans and Programmes Regulations 2004. This requires that when deciding on the scope and level of detail of the information that must be included in the IIA report, the responsible authority shall consult the consultation bodies. A scoping workshop was held in July 2015 with attendees from the consultation bodies and other organisations including: the Greater London

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					Authority (GLA); Transport for London (TfL); OPDC; Historic England; the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Kensington and Chelsea; Public Health England; and the Environment Agency. The outputs of this workshop informed the IIA Scoping Report. The Scoping Report was subject to a 5 week public consultation period between 4 September and 5 October 2015. All stakeholders on OPDC's consultation database, including consultation bodies, community groups and individuals, were notified.
IIA/3	IIA	The "Community-Based Vision and Objectives" submitted by the Grand Union Alliance, should inform an assessment of alternatives to the current OPDC Reg 19 local plan	13	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>No change proposed. National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.</p> <p>The proposed community-based vision and objectives were submitted as part of the OPDC Local Plan regulation 18 consultation. The content of the proposed</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					vision and objectives were embedded within the spatial vision, narratives and policies of the OPDC Local Plan regulation 19 consultation. As such, OPDC did not consider the vision and objectives were reasonable alternatives as they weren't sufficiently distinct from the content of the Local Plan to highlight the different sustainability implications so that meaningful comparisons can be made. In light of this the IIA did not specifically assess the proposed community-based vision and objectives as reasonable alternatives.
IIA/4	IIA	Appendix G is missing from the IIA published for public consultation	13	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. Part 4.5 of the IIA refers to Appendix G in relation to mitigations measures. This was an error. Reference should have been made to Appendix F. This minor amendment has been made.
IIA/5	IIA	The IIA does not accord with legislation or NPPF and NPPG guidance. Alternative strategic options or reasonable alternative options	15	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. The IIA has been developed and consulted on in accordance with the relevant legislation, national guidance and good practice guidance to identify, describe and evaluate the likely significant effects on the environment of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		<p>have not been tested in regulation 18 and 19 versions of the Local Plan.</p> <p>IIA of the overall Local Plan has not been carried out. Proposed community-based vision should be used for IIA alternative option assessment for the whole Local Plan.</p>		<p>Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Just Space, Old Oak Interim Neighbourhood Forum</p>	<p>implementing the Local Plan, including reasonable alternatives.</p> <p>No change proposed. The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Regulation 18 Local Plan. The IIA of the Regulation 19 did not assess reasonable alternatives in accordance with NPPG paragraph 013 Reference ID: 11-013-20140306.</p> <p>NPPG Paragraph: 001 Reference ID: 11-001-20140306 confirms that "Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation."</p> <p>Government guidance advises that only reasonable alternatives to proposals should be considered. NPPG Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.”</p> <p>The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test lower development</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable.</p> <p>No change proposed. OPDC's IIA carries out a proportionate approach in its assessment in accordance with NPPF paragraph 167. Specifically, the spatial vision and narratives have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives. A more detailed assessment of the policies has been undertaken using an assessment matrix. These assessments are then considered in the round to provide a summary of the assessment which is set out on page iv of the IIA.</p> <p>However, an assessment of strategic options was carried out in the IIA for the Regulation 18 consultation following recommendations of good practice</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<p>guidance. OPDC considered that the approach to affordable housing warranted assessment as a strategic option. This reflects the potential impact of the different approaches to affordable housing may have on wider placemaking and infrastructure requirements.</p> <p>The regulation 18 Local Plan also proposed alternative policy options. These were considered to be reasonable alternatives and were assessed by the IIA for the regulation 18 Local Plan.</p> <p>No change proposed. The proposed community-based vision and objectives were submitted as part of the OPDC Local Plan regulation 18 consultation. The content of the proposed vision and objectives were embedded within the spatial vision, narratives and policies of the OPDC Local Plan regulation 19 consultation. As such, OPDC did not consider the vision and objectives were reasonable alternatives as they weren't sufficiently distinct from the content of the Local Plan to highlight the different sustainability implications so that meaningful comparisons can be made. In light of this the IIA did not specifically assess the proposed community-based</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					vision and objectives as reasonable alternatives.

Victoria Road and Old Oak Lane Development Principles

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
VROOLDP/1		The study should recognise that the Midland Gate site is suitable for a tall building due to its location and contribution to delivering key infrastructure.	1	Castlepride Limited	No change proposed. Principle 4.7 of the Victoria Road and Old Oak Lane Development Framework Principles document identifies that tall buildings may be appropriate around Old Oak Common Lane Station subject to other relevant planning policies. OPDC considers this is an appropriate approach to the role and function of the Principles Document.

Sports Courts and Swimming Pools Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SCSPS/1		Do not consider the work undertaken as part of the Sports Courts and Swimming Pools Study to be sound as the work was focussed on Hammersmith and Fulham.	1	Sport England	No change proposed. The study was commissioned for Hammersmith and Fulham Council but identifies current provision and demand across the entire 3 host boroughs and therefore can be relied on as evidence for OPDC's purposes.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SCSPS/2		Do not support the standards approach set out in the policy	1	Sport England	No change proposed. OPDC has attempted to comply with the Sport England guidance, undertaking an assessment of need and understanding broadly how this need will necessitate new sports facility provision. OPDC's Local Plan identifies the need for two on-site sports and leisure facilities. However, the exact size of these facilities will be contingent on the population generated by development and there needs to be a way of calculating how each individual scheme should fairly and reasonably contribute to any sports and leisure facility. OPDC therefore considers a standards approach to be the robust way of securing contributions from developers that would best satisfy the S106 tests and would enable appropriate implementation of an equitable equalisation mechanism (and any required retrospective pooling contribution) for the funding of on-site (in-kind) infrastructure.

Precedents Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
PS/1	Precedent Study	The Local Plan should include Bosco Verticale in Milan as an example of how tall residential	13	Hammersmith Society, Wells House Road	Change proposed. OPDC agrees that Bosco Verticale should be included within

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		buildings can avoid being dehumanising.		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	OPDC's Precedent Study. It is a good precedent in terms of design and environmental standards, but it should be recognised that the building had high construction costs, impacting on its affordability to occupiers.

Socio-economic Baseline Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SEBS/1	Socio Economic Baseline Study	This study wrongly assumes funding is in place for new stations and fails to discuss development without the 3 new train stations.	1	Friary Park Preservation Group	No change proposed. The study is focussed on the current baseline.

A40 Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
A40/1	A40 Study	The A40 Study does not include the junction with Concord Road.	1	West Twyford Residents Association	TfL undertook this study as they are the strategic roads and TfL are the highway authority.

Public Realm, Walking and Cycling strategy

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
PRWC/1	Public Realm, Walking and Cycling strategy	Study does not recognise the needs of the elderly and disabled.	1	Friary Park Preservation Group	Noted. No change proposed. The study investigates the need to provide resting places and gradients of at least 1 in 20 to ensure the connections are accessible for all.
PRWC/2	Public Realm, Walking and Cycling strategy	No definition of major routes is provided, while only existing cycle paths in Park Royal are discussed.	1	Brent Cyclists	Noted. No change proposed. The route maps show the key routes and these are including in figure 7.7.
PRWC/3	Public Realm, Walking and Cycling strategy	Support proposals for new bridges and underpasses, which must be designed to a high standard and need to be perceived as safe to use	1	Brent Cyclists	Noted. No change proposed. ODPC will promote the use of high quality materials to ensure bridges and underpasses are well designed and therefore well used

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
PRWC/4	Public Realm, Walking and Cycling strategy	Need to ensure taxis and cars dropping off at stations do not impact on cycling infrastructure	1	Brent Cyclists	Noted. No change proposed. OPDC will work with TfL, Network Rail, HS2 Ltd and the local authorities to ensure there are adequate facilities for taxi ranking and that these do not impede cyclists. Private vehicle drop offs are strongly discouraged as detailed in the T5 policies.
PRWC/5	Public Realm, Walking and Cycling strategy	Statement that infrastructure should be LCDS design standards should be included in the Local Plan.	1	Brent Cyclists	Noted. No change proposed. This is indicated in Policy T3
PRWC/6	Public Realm, Walking and Cycling strategy	Do not support inclusion of shared lanes on Network diagram showing types of cycle paths.	1	Brent Cyclists	Noted. No change proposed. The detail of segregation or shared cycle lanes will be explored further as the design for the network progresses.

Willesden Junction Feasibility Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
WJF/1	Willesden Junction	Study is not sound, and thereby the Draft Local Plan is also unsound.	1	John Cox	Noted. No change proposed. OPDC officers produced this study with TfL and Brent and with support from Network Rail who own the station. It is believed to be sound.
WJF/2	Willesden Junction	Study is not positively prepared due to assumption that two existing bay platforms at the Station can be lost.	1	John Cox	Noted. No change proposed. This assumption was agreed by stakeholders including TfL and Network Rail.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
WJF/3	Willesden Junction	There has been no consultation on reasonable alternatives.	1	John Cox	Noted. No change proposed. The study produced a long list of elements which were combined to create three options for the station. These were consulted upon as part of the local plan.
WJF/4	Willesden Junction	The document does not seek to meet objectively assessed development and infrastructure requirements.	1	John Cox	Noted. No change proposed.
WJF/5	Willesden Junction	The consultation process was not sufficient and did not meet the standards of the OPDC statement of community involvement.	1	John Cox	Noted. No change proposed. OPDC consulted with the Neighbourhood Forum on the options and secondly as part of the Local Plan, in line with the OPDC statement of community involvement.
WJF/6	Willesden Junction	The study is not positively prepared as it does not consider increased passenger demand and station capacity.	1	John Cox	No change proposed. The study looked in detail at passenger demand and capacity and modelling 10 demand scenarios which are detailed in the study
WJF/7	Willesden Junction	The study is not positively prepared as it does not allow provision for every feasible rail route in London.	1	John Cox	No change proposed. The study investigated the current routes serving the station and passive provision for the West Coast Mainline link. This was deemed reasonable by TfL and Network Rail.
WJF/8	Willesden Junction	The study is not justified because it is not the most appropriate strategy.	1	John Cox	Noted. No change proposed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
WJF/9	Willesden Junction	A maximal strategy for Willesden Junction needs to be produced.	1	John Cox	Noted. No change proposed.
WJF/10	Willesden Junction	Four-tracking at Willesden Junction low-level is a feasible and desirable outcome of redevelopment.	1	John Cox	No change proposed. Providing platforms on the fast lines or relief lines has not been considered to date. Analysis would be required to determine whether there is a case for providing these platforms. It is unlikely that there would be a case to call fast line services at Willesden Junction.
WJF/11	Willesden Junction	Passenger services on the West Coast Main Line should be delivered at Willesden Junction Station.	1	John Cox	No change proposed. The study investigated the option of passive provision for the West Coast Mainline platforms to be reinstated at Willesden Junction. This is an aspiration of OPDC and LB Brent. Further work is required by Network Rail and TfL to test if this is feasible.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
WJF/12	Willesden Junction	The document should test the feasibility of a maximum scenario of four low-level platforms, four high level platforms, two West London Line platforms and 8 WCML platforms.	1	John Cox	<p>Noted. No change proposed. The study was developed with Network Rail and TfL. Providing platforms on the slow lines of the West Coast Main Line (WCML) remains a potential option for the future and any station enhancements made at Willesden Junction will not preclude their future provision. For them to be constructed, it would be necessary to demonstrate to the rail industry that the benefits for passengers boarding and alighting WCML services at Willesden Junction outweigh the adverse impact of longer journey times for through passengers. It will also be necessary to demonstrate that the additional station calls can be accommodated in the timetable and that funding to construct the platforms can be found.</p> <p>Providing platforms on the fast lines or relief lines has not been considered to date. Analysis would be required to determine whether there is a case for providing these platforms. It is unlikely that there would be a case to call fast line services at Willesden Junction.</p>

Appendix G

Organisations invited to make representations on the first Regulation 19 (1) Draft Local Plan in summer 2017.

Organisation
100% Digital LTD
24-7 Drama
3D Reid
5th Studio
A B M Motors Ltd.
A New Direction
A.W. Interiors
AA Cash + Carry
Abbey Bay
Abbey Manor
Ableprop Limited
ABM
Abu Afif Sweets
Acava
ACAVA studios
Accident Claim Company
Ace
Ace Cafe London
Ace Post Production
ACPO Secured by Design
Acton Central (Ealing)
Acton Coachworks
Acton Community Forum
Actwe Ventures
Acute Properties
AD Londres
AD Wake Ltd
Addictive
Addleshaw Goddard
Adjunct Associate
Adventum Offshore Private Limited
AECOM
Aedas
Afks Construction
AGA Motors
Aggregate Industries UK Limited
Ala Kayfak

Organisation
ALAN CAMP
Alba Stone
Albion Waste
Alchemi Group
ALDAU
Aldau Development
ALDStone
Alexanders
Alfimar
Alison Brooks Architects
Al-Jabal Bakery
Al-Jabal Foods
Allies and Morrison Urban Practitioners
Almacantar
Almalthea Designs
Alpha Transfer Ltd
Al-SQR Express
Alter London
AM Construction LTD
Amari Plastics
Amaya
Amber Sphere
AMBICAN
Ameresco
Ammoura
Amro Real Estate Partners
AMZ Motors
Anderson Wilde & Harris
Apply Food and Drinks
Appy Food and Drinks
Aqua architecture ltd
Aqua Lite
Aquality Trading & Consulting Ltd.
AR Architecture
AR Motors
AR Urbanism
Archies

Organisation
Architecture for London
ARCO Safety Suppliers
Ardmore
Argent
Ariana Autocrash
Arid Norman
ARK Bentworth Primary Academy (London Borough of Hammersmith & Fulham)
Arney Fender Katsalidis
Art House Hire Ltd
Artesi
ARUP
Ary Network LTD
AS Cars
Asbestech LTD
Asda
Asesorama
Ash Sakula Architects
Ashby Croft
Assembly Studios
Asserson
Aston
Astudio
Atex Business Solutions
Atkins Limited
Aurora Property Group
Aussie Man & Van
Auto Audio
Auto Stilo
Auto Trust
Automotive
Avant Garde
Awafi Foods
Aylesworth Fleming
Azerbaijan Development Company
B&Q
B&Q / Trade Point
B.V.C.
B4U
Babcock
Bakavor
Baker Rose
Balfour Beatty

Organisation
Ballymore
Bank of America Merrill Lynch
Bar Bar
Baraka CafÃ©
Barbara Weiss Architects
Barbers
Barker Ross recruitment
Barrybank
Barton Willmore
Battersea Power Station Development Company (BPSDC)
Battle McCarthy
BBC
Beat about the Bush
Bechtel
Beckley Group
Bedford
Beehive Projects
Bel Motors
Bella Pierre Cosmetics
Bellway
Benchmark
Benoy
Berkeley
Berwin Leighton Paisner
Bespoke Events London
Best Clearance LTD
Bimber Distillery
Bircham Dyson Bell
Blue Sky Development
Bluespec
BMO Real Estate Partners
BMW
BNP Paribas Real Estate
Boden
Body Shop
Bodywork Business
Bond Bryan
Boodle Hatfield
Book People
Bostock and Pollitt
Bounce Back
Bracknell Forest
Brakes

Organisation
Bravo Wembley
Brazilian Association
Brazilian Salon
Brent Citizens
Brent Council - Green spaces
Brent Cyclist
Brent Cyclists
Brent Friends of the Earth
Brent Housing Action
Brent Mencap's Disabilities, Rights and Politics Group
Brent resident
Brent, Harrow and Hillingdon CCGs
Brent, Harrow, Hillingdon and Ealing CCGs
Brian Clarkes Studio
Bridget Baker Consulting
Brighton and Hove City Council
Brightsparks
Brisac Gonzalez
Bristows LLP
Britfil Steel Fab
British Council
British Embassy Beijing
British Land Developments
Broadgate Estates
Broadway Malyan
Brookfield
Brown & Mason Limited
Brunel University
BSS
BT Innovate & Design
BTRT Ltd
Buckinghamshire County Council
Builder Depot
Burges Salmon
Burleigh College
Burlington Danes Academy (London Borough of Hammersmith & Fulham)
Buro Four
Buro Happold
Burohappold Engineering
Bury Council
Business Mobiles

Organisation
Business Prestige
Butler and Young
By This River
Cadogan Tate
Café Royal
Café Ola
Cambridgeshire County Council
Camebpt
Campaign for Better Transport
Campbell Architects
CAN Forum
Canal & River Trust
Canal River Trust
Canapes Direct
Cannon Hygiene
Cannon Hygiene Ltd
Capco
Capita
Capital Accountants Ltd
Capital PIP
Car Body Repairs
Cargiant
Carlo Manzi
Carlos Garage LTD
Carter Jonas
Castle Pride
Catalyst Housing Group
Catapult Future Cities
Catch 22
CBRE
CBRE Hotels
CCH
CENF
Central Bedfordshire
Central London, West London, Hammersmith & Fulham, Hounslow and Ealing CCGs (CWHHE CCGs)
CgMs
CH2M
Chair FOWS
Chair H&F Historic Buildings Group
Chair of OOFRA
Chair: Harlesden Town Team
Chandlers Roofing

Organisation
Chapman Taylor
Charmant
Chart Lane
Cheyne Capital
Child Graddon Lewis
Chiltern Railways
Choice
Chris Blandford Associates
CIMB Bank Berhad
Cirque du Soleil
Citi Logik
City & Docklands
City and Docklands
City Insights
City of London Corporation
City of Westminster
Cityscape Digital
Civil Aviation Authority
CLAD
Clarion Housing Group
Classic Fine Foods
CLAUK
Clearance World
Clearview Homes
Cleshar
Clicks and Links Ltd
Cliomat
CNR International Trade Fairs Inc.
Co Work Hub
College Park and Old Oak (H&F)
College Park Residents Association
Collins Motors
Colonial World Foods
Colour Sound Experiment
Commonplace
Compagnie du Parc Limited
Concept
Concept Engineering Consultants Limited
Conductor Marketing
Construction Catering Services
Construction Catering Services (CCS)
Construction News
Construction Products Association

Organisation
Construction Youth
Cothill Educational Trust
Country Garden
Countryside
Covent Garden Candles
Coverdale Barclay
CPA / WPA
CPC Project Services
CPPS
Cracknell
Create Space London
Create Streets
Creative Genies
Crisis
Crofton
Crosstree
Crown Paints
Curtins
Custard Factory
CWHHE CCGs
Cyrenians
D Cutler International LTD
DAC Beachcroft
DAF Royal Parks
DAMAC Properties
Dandi Space
Danny Sullivan Group
Darnton
Data Centre
David Lock Associates
Dawnfern Ltd
Day Lewis Planning Ltd
Deadline
Dean Street Developments
Delight Capital
Deloitte
Delta
Deluxe Printers
Department for Communities and Local Government
Department for Communities and Local Government BIS
Department for Transport
Dephina

Organisation
Dephna
Dephna Estates
Design Council
Design Engine Architects Ltd
Design Haus Liberty
Design South East
Designer Flowers Ltd
Designers Guild
Deverell Smith
Deverellsmith
DeVono
Dexter Moren Associates
Diageo
Diamond Vehicles
Diocese of London
Dominos
Domino's Pizza
Domus
Dooa
Door Entry Direct
Dorset County Council
Dowa
DP9
DPD
DPRA
Dragon King
DS2
DSI Foods
Ducane Housing Association
Duggan Morris Architects Ltd
Dukelease
Durkan Limited
Dutch and Dutch
DWD2
Dyer and Butler
E.P.A. Languages Services Ltd.
Eagle Tyres
Ealing CCG
Ealing Central and Acton
Ealing Civic Society
East Acton (Ealing)
East Sussex
East Sussex County Council

Organisation
Eastdil Secured
Ebbsfleet Development Corporation
EC Harris
ECG
Ecocycle
Ecotricity
Edelman
Elec Mec
Elegant Dry Cleaners
Elite-ia
Ellen MacCarthur Foundation
Elliott Wood
EMR
Enabling Projects (Town Planners)
Energy and Utilities Alliance
Enfield Council
Enfield Council - Planning Policy Team
English Heritage
Enotria & Coe
EnPlus
Enterprise Singapore
Entiq
Envac
Environment Agency
EON Energy
Epsom & Ewell Council
Equinix
Eskonas
Essential Living
Essex County Council
Estates Gazette
ETC Connect LTD
Eton International
Euro Bridge
Euro Car Parks
Euroclad
Europcar Car Rental
European Glass
European Metal Recycling Ltd
Eutech Cybernetic
Eva Real Estate Appraisal Consultancy
Evolve Agency
F&H Auto LTD

Organisation
F1 Motors
Facebook
Fairview Homes
Faithful Gould
Family Mosaic
Far Reach Group Limited
Farley
Farley Prop Hire
Farrells
Feel Good Caribbean Restaurant
Feel Good Carribean Resteraunt
Feilden+Mawson
Ferax Estates
Film & TV Services LTD
Film + Medical
Financial Times
Fit Out UK
Fletchers
Fletcher's Bakery t/a Grain d'Or
Flexeye
Floral Image
Fluid
FM Conway
Focus International Christian Centre
Fone House
Food Distribution
Forbes
Forefront
Foreman Roberts
Formation Architects
Forty Shillings
Foster + Partners
Foundry
Four Fifty Six
Four Zero One
FOWWS
Francis Knight
Frank Wingate Communtications
Freshmart
Friends of Wormwood Scrubs
Fruition Properties
Fulham Good Neighbours
Fulton Umbrellas

Organisation
Fund Analyst
Furness Primary School (London Borough of Brent)
Furniture
FX Rentals
Galicia Laundry
Game Arena
Gang of Virtue ltd
Garousca
Gateway Ltd.
Gemdale Corporation
Genesis Housing Association
Gensis Housing
Gensler
Gerald Eve LLP
Get Set Hire
GIA
Ginkgo Tree Investment Ltd
Giordani Caf��
GL Hearn
Glasgow Chamber of Commerce
Glenn Howells Architects
Global Cars
Global Guardians
Global Skills Centre
Globalcars
Glover
Golden Oriental Foods Limited
Golden Vans LTD
Goldman Sachs
Goldman Sachs International
Goldsmiths Residents Association
GP Supplies
GP SUPPLIES LTD
GPPUG
Graham & Green
Grainger plc
Grand Junction Arms
Grand Union Alliance
Great Hire
Greater London Authority
Greater London Authority
Greater London Authority - Local Nature Partnership

Organisation
Greenpol International
Grohe
Guinness
Guray Group
GVA
H&F
H.R. Owen
Haarlemmermeer
Habiteo
Hackney Council - Planning Policy Team
Halfords Autocentre
Hammersmith & Fulham CCG
Hammersmith & Fulham Liberal Democrats
Hammersmith and West London College
Hammersmith BID
Hammersmith London
Hammersmith Society
Hammersmith United Charities
Hamon Investment Group
Hampshire
Hanama Storage LTD
Handelsbanken
Hanger Hill (Ealing)
Hanger Hill East and Hanger Hill Garden Estate Residents Associations
Hanger Hill Garden Estate Residents Association
Hanwell Hootie
Harlesden Neighbourhood Forum
Harlesden Town Team
Harlesdon Neighbourhood
Hart & Co
Hatton Metal Craft
Havering
Hawkeyesports
Hawkins/Brown
Hawthorn
HayesDavidson
Haymarket, Planning resource
HC Developments
Health and Safety Executive

Organisation
Health Watch Waltham Forest
Heathrow Airport
Hendon Motors
Hepher Grincell
Hertfordshire County Council
Hessar Trading LTD
Hickman Transport
Higgins
High Speed Two Limited
Highways Agency
Hill
Hilson Moran
Hilti (Gt. Britain) Ltd
Hilton
Hireman
Historic England
HLM
HM Printers LTD
HM Treasury
Hoare Lea LLP
Hodders Law
HOK
Holiday Inn
Holiday Inn Express
Homes and Communities Agency
Homey Well
Honey
Hospira
Hot Cam
Hot Flame
Hothouse 3D Scanning
Hotrod
House of Lords
Housewife Cash & Carry
Howard Kennedy
Howdens
Howes Percival Solicitors
Hoxton Beach
HPL
HR Owen
HS2
HT Drinks
HUAWEI TECHNOLOGIES (UK) CO., LTD.

Organisation
HubBox
Hyde Housing
Hyper Japan
Hyperoptic
Hyperoptic Ltd
I.S Ameen
Ian Marcus Consultants
iArchitecture
IBI GROUP
Iconic
IFC Group
iGym
IHSS
Il Fornaio
Imperial College
Imperial College London
Inbrit
Inclarity
Indigo Planning
Individual
ING• PR & COMMUNICATIONS
Inland Waterways Association
Innovate UK
INSTINCTIF
Institution of Civil Engineers
Intel Corporation
Internet Trade
Investin In Capital
Iraqi & Middle East Catering
Ironing Shop
Irwin Mitchell
Isabelle
Isle of Wight
Istanbul Metropolitan Municipality
Italian Furniture, Carpet & Flooring
Ith Pharma
its Technology Group
I-UK
J A Glover Ltd - Ventilation Products
J.Y. Hancock & Associates Ltd
Jack Wills
Jamaice National Mobile Unit
Janelle's Floral Design

Organisation
Japan Centre
Japan Local Government Centre
Jascots WineMerchants
Jet Aero Fuels
JFC UK Ltd
JLL
JMP
jnpgroup
John F. Hunt
John Lewis
John McAslan + Partners
John McNulty
John Perryn Primary School (Ealing)
Jonathan Roberts Consulting
Jones Lang LaSalle Ltd
Jones Productions
JT Car Repairs
JTJ Workplace Solutions Ltd
Junction Local
Just Care Group
Just Space
K & D Carpets
Kakuei Printing
Kaye's Blinds & Curtains
KBM Chartered Accountants / Business School
KBR
Keltbray Ltd
Kenmont Primary School (London Borough of Hammersmith & Fulham)
Kensal Green Programme
Kensington Security Doors & Windows
Kent County Council
Keym
Kier Construction
King & Wood Mallesons
Kings College London
Kingston Council
Knowsley Council
Kohn Pedersen Fox Associates (KPF)
Kolak
Kotrak
KSR ARCHITECTS
KSS

Organisation
L&Q Group
La Cabana
La Maison
La Maison des Sorbets Foods Ltd
Labour MP for Hammersmith
Lahori Tikka Masala
Lance Box Group
Lancer Property
Land Lease
Land Securities
Language School
L'Aquila
LaSalle
LatinElephant
Laundry & Ironing
Lazenby
LDA
Le Pain Nouveau
Lebanese centre
Lebanese Centre LTD
Lebanos Food Trading
Leep
Lees BMW
Legal & General Investment Management
Lend Lease
Levy Real Estate LLP
Lewisham
LEXINGTON COMMUNICATIONS
Liberal Democrat Group
LIFE Residential
Lift People
Lincolnshire
Line Planning Ltd
Link Wholesalers
Livemore
Lloyds Banking
Lloyds Motor Spares
Lloyds PR
LMDS Foods
Imtech Traffic & Infra UK Ltd
Infabode
Lobanan
Local Council

Organisation
Local Dialogue
Local Government Association
Local Res and FOWS
Local Resident
Lodestar
London & Continental Railways Limited
London & Regional Properties
London and Partners
London Assembly
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bexley
London Borough of Brent
London Borough of Bromley
London Borough of Camden
London Borough of Croydon
London Borough of Ealing
London Borough of Enfield
London Borough of Hammersmith & Fulham
London Borough of Hammersmith and Fulham
London Borough of Haringey
London Borough of Harrow
London Borough of Havering
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Redbridge
London Borough of Richmond
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
London Borough of Wandsworth
London Chamber of Commerce And Industry
London Citizens

Organisation
London Docklands Development Corporation (former)
London Fire Brigade
London First
London Forum of Amenity & Civic Societies
London Forum of Amenity and Civic Societies
London Legacy Development Corporation (LLDC)
London Local Energy
London Mobility
London Sustainable Development Commission
London Tenants Federation / GUA
London Theatre Company
London Waterways Projects
London west Quakers
London Wildlife Trust
LondonBT Group
Longford Trust
Lotus Linens
Loubnan Natural Foods LTD
LP Construction Ltd.
LTF/Project worker for grand union alliance
LTS
Lucid
Luckshmee Limited
Luton
M & M Metalwork Ltd
Mace Group
Mackin Construction LTD
MadeByPi
Mak Automotive Co.
Make
Mama Youth Project
Mand Metal
MandG Investments
Marble Joinery
Marine Management Organisation
Marketing Derby
Martell Electronics Ltd
Mash

Organisation
Maxlight
Mayors Fund for London
MBA Architects Ltd
Medway
Medway Council
Mega Marble
MERC
Mercedes Benz Specialist
Metropolitan Police
Michael Brady LTD
Middle East Cargo Services
Middlesex Hose & Fittings LTD
Midland Terrace
Midland Terrace, Shaftsbury gdns,
Milton Investment
Milton Keynes
Minds LTD
Minerva Motors LTD
Mirrorstoke Ltd
Mishcon de Reya
Mitsubishi Estate London Limited
MM Couriers
Momentum
Montagu Evans
Motsen Group
Mott MacDonald
Mount Anvil
Mountain of Fire & Miracles
Movement Strategies
MP Morgan
Museum of London Archaeology (MOLA)
Nad Garage
Nadi Park Royal
Namaste Health & Wellbeing
Nandos
National Bargee Travellers Association
National Electrical
National Grid
National Lighting
Natural England
Natural History Museum
NDA Motors
Neighbour

Organisation
Network Homes
Network Rail
Network Rail, High Speed Rail Development
New Space Design LTD
Newman Francis
Newsfare
Nexus Planning
NHS
NHS England
NHS North West London (Collaboration of 8 CCGs)
Nichols
Nifeislife.com
NineElms
Nomadic Rug Gallery
Nomura Research Institute, Ltd
Norfolk County Council
North Kensington Gate
North Lincolnshire Council
North London Waste Plan
North Yorkshire County Council
Northamptonshire County Council
Northfields Estate Agent
Nosh Caf��
NQP Development Services
NRS
NSB Casements
OAOA LTD
Ocean Media
Oceanic Jewellers LTD
OCO
Off License
Offer Group LTD
Office Moving International
Office of Rail and Road
Officina Coppola
Ogilvie Geomatics Ltd
O'Herlihy & Co.
Old Oak / Mosaic Housing
Old Oak Caf�� & Restraunt
Old Oak Estate resident
Old Oak Housing Association
Omega Bikes

Organisation
Omega Lettings
Onelansdowne / Guildhouse Rosepride
Only Connect and West London Zone
OUBE Ltd
Opticians
Options It
Optonica
Ordnance Survey
Orexis Fresh Food
Orsini Brewin
Outer London Commission (and OPDC Planning Committee)
Oxygen Freejumping
Oxfordshire County Council
PAF
Panalux
Panic Music
Paragon QMS
Park Royal Business Group ��
Park Royal Cars
Park Royal Mot Centre
Park Royal Post Office
Park Royal Studios
Park Royal Taxi Centre
Park Royal Timbers
Parklane Group
Partner Capital
patient participation group representing health services within the MDC boundary
Paul
Paul Vanstone Sculptures
Pauls Auto Repairs
pba
PCBS
PCSG
PDP London Architects
PDS
Peachcroft
Peal Windows
Peek and Rapkin Food Events
Pelicanbespoke
Pell Frischmann
Pentecostal City Mission Church

Organisation
People Of The Road
Perfect Crystal
Perfection Salon
Persia Food LTD
Persona Associates
Peter Brett
Peterborough City Council
PHE (London)
pi global - brand shaping specilists
Pit Start Garage
PJ Leonard Haulage LTD
Planning in London
Plastic Omnium
Plowman Craven
PLP / Architecture
Policy Studies Institute
Pollitt & Partners
Pomodoro
Portobello Fashion
Portsmouth
Portugalia Wines UK
Posh Dogs
Potter Raper Partnership
Powerday
Pramerica
Preedy Glass
Prefit
Premier Car Care Centre LTD
Premier Park Studios
Prime Light
Princes Trust
Pringle Brandon PW
Print Sign Design
Printhouse Corporation
Pro Health
Prokit
Promet Technology LTD
Promotive Chauffeurs London LTD
Property Investment & Development
Property Management
Property Week
Provectus Group
Providence Capital Management

Organisation
PSAV
PSB London Ltd
PUPDI
Qinetiq
QPR
Quad
Quatro Public Relations
Queens Park Rangers
Queens Rolla House
Quintessence
Quod
Rail Exec
Rainmaker Partners
Ramsay Shipping
RCKa architects
Reactive Group
Reading
Real Asset Partners
Realia Capital Management
Realized
Realopedia
Rebecula Consulting Limited
Recognition Express
RED
Red Creative
Red Line Car Services
Red Rose Bakery
Redbox
Reed Global
Reed in Partnership
Reed Midem
reForm
Regeneration Investments
Regent Gas
Regents Dry Cleaners
Regents Network
Regis
Reiach And Hall Architects
Reigate & Banstead
Renaissance Investment
Renault
Resapol
Resident

Organisation
Residential Edge
Residential Moorings Group
Resonance
Respect Care
Resurgence
Reverie Autos
revo seccus
Revolving Doors
RICS
Rise
RJ Patching
RL Designs
Robert Bird Group
Robson Walsh LLP
Rogers Stirk Harbour And Partners
Rolla Dome All Skate
Rosepride Limited
Roya Mail
Royal Albert Dock London
Royal Borough of Greenwich
Royal Borough of Kensington & Chelsea
Royal Borough of Kingston Upon Thames
Royal Borough of Windsor & Maidenhead
Royal Gourmet
Royal Holloway University of London
RPM LTD
RR Media
Rubbish Hunters
Rubbish Solutions
Ruffena Capital
Rustin Coffee / A E Stanton & Co
Ryder
Ryder Architecture Limited
S.Walsh & Son Ltd
SAC
Sainsburys
Sainsbury's
Salam Supermarket
Salon Services
Sami & Co Accountants Ltd
Sample Studio

Organisation
Savills
Savoir Beds
Scanprop Development, Stockholm
Scenario Architecture
School of Architecture & Planning
Schroder Real Estate Investment Management Limited
Schroders
Science Museum Group
Seaward Travel
SEGRO
Select Property Group
Semo Auto
Serco
Service Auto Romanesc
Shadow on Thames
Shahan Mobile
Shared Assets
Shepherd's Sandwich Bar
Sheppard Robson Architects
Shine Motors LTD
Show Reel
Shurgard
Shurgard Self Storage
Sickle Cell Society
Siemens
Sigma Capital Group Plc
Silver Spring Networks
Simon Bowden Architecture
Simply Fresh
Sinarmas Land
Sir Robert McAlpine Ltd.
SISK
Skanska
Skyline Campaign
Slough Borough Council
Small Back Room
Smartec Systems Ltd
Smith & Hunter Prime Car Care
Snobs Ultimate Customs
Solalights
Southend on sea
SP Broadway
Spanich Slate Quarries Ltd

Organisation
Sparks
Speciality Drink LTD
Speedy Assets Services
Spiros Motors
Sport England
Sports Dimension
Squint/opera
SSA Planning
SSC LTD
SSE
SSE Audio Group
ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM
Stadium Capital Holdings
Stand By Chef
StandByChef LTD
Stanhope plc
Starboard Hotels
STC
Steel Fabrications
Stellacom
Stephen Swords
Sterling Studios
Stewart Parvin
Stone World
STQW
Stratstone
Strongbase Construction LTD
Studio Bednarski ltd
Stuff 'u' sell
Sufflok
Sukarah
Sunbeam
Sunrise Caf��
Super Hire
Super Save
Supponor LTD
Surrey County Council
Sutton Council
Sweet Land
Symmetrys Limited
Szerelmey
T&S Enterprises
T&SEnterprises (London) Ltd.

Organisation
Taiko Foods
Talbot Scott
TeamWork Strategic Consultants
Telereal Trillium
Telford Homes
Temple Group
Tenpin Acton
Terence O'Rourke
Texaco Garage
Thai Design
Thames Valley Harriers / Linford Christie Stadium
Thames Water
The Architects' Journal
The Artisan Bakery Ltd
The Bartlett Centre for Advanced Spatial Analysis
The Castle Pub
The Coal Authority
The Collective
The Costume Store UAL
The Daylight Company Ltd
The First Mile
the First Mile ltd
The Foundary
The Hammersmith Society
The HOK Planning Group
The Hyde Group
The Land Trust
The London Bakery
The Olive Grows
The Organic Pharmacy
The Power Station
The Procurement Co
The Real Greek
The Restart Project
The Royal Bank of Scotland
The Safety Supply Company
The Soundhouse LTD
The Spice Land
The Transport Exchange Group
The Village Trading Store
Thesqua
Thompson Cole

Organisation
Thomson Motors Accidental REpair Centre
Thorp Technology Ltd
Thurrock Council
Tideway
Tim Spenser & Co
Tishman Speyer
TITRA
TM Forum
TM Plant
TOBIN Consulting Engineers (UK) Ltd
Tool Station
Topaz Detailing
Torpedo Factory Group
Tortorolo & RE
Totality
Touchstone Worktops LTD
Tough Glaze
Town and Country Planning Association
Transcom Telecom Ltd
Transport for all
Transport for London
Transport for London, London River Services
Transptuc LTD
Travel Lodge
Traxden Motorcycles
Trinidad Roti Shop
Troop London
Trowers & Hamlins
Tucker-French
Turley
Turntown
Twin Sustainability Innovation
Twyford Abbey
Tyréns UK
U and I plc
U3A Southall
UBM
UCL
UCL and Just space
UCL Student
UEM SUNRISE
UK Power Networks

Organisation
UK Property Forums
UK Regeneration
UK Trade & Investment
UKTI British Consultate
Ullah Law Associates
Unbloc Drainage
Uni Trust
Uniform
Unit Trust Protection Services
United Biscuits
United Kingdom Tyre Exporters Ltd
UniTrust Protection Services (UK) Limited
Universal Display
Universal Motor Training
University College London
University of Brighton
University Of West London
Urban Land Institute
Urban Legacies Limited
Urben Studio
Useful Simple Projects
V9 Universal
Vale Europe Ltd
Vale Inco Ltd
Vastint
Vectos
Velocity
Veolia
Vibe Motors
Victoria Gardens Development LTD
Vigo Group
Village Urban Resorts
Virgin Media
Vivalda
VMI
Vodafone
Vogan Capital LTD
Volterra
Voreda LLP
Wagstaffs Design Ltd
Wallace HGV LGV PCV Bus Coach Driver CPC Forklift Training
Wardwell Armstrong

Organisation
Warmup Plc
Watford Borough Coucil
WATG
Watkins Gray International LLP
Wawickshire County Council
Way On
Wazoku
wcec group ltd
WCRA
Wearefield
Well Working
Wellcome Trust
Wells House Road
Wesley Estate
Wesley Estate residents association
West Acton Residents Association
West Berkshire
West Creative
West Ealing BID
West London Alliance
West London Business
West London College
West London Line Group
West Sussex County Council
West Twyford Residents' Association
Westbourne
Westbrook Partners
Westbrook Properties
Western Riverside Waste Authority
Westfield
Westminster City Council
Weston Williamson+Partners
Westway Housing Association
Wet Design
Whitbread
White arkitekter
White Label
White Rose Laundries
Whitedrake
Wholesale & Retail
Wholesale All Bees
Wierzejki
Wild Blue Cohort

Organisation
Wiltshire Council
Wimshurst Pelleriti
Winser London
Wireless Infrastructure Group
Witteveen+Bos
Wokingham
Wokingham Borough Council
Wolseley
Women's Pioneer Housing
Woods Bagot
Worcestershire
Wormoholt and White City Neighbourhood Forum
Wormwood Scrubs Pony Centre
WSP Group
WSP Parsons Brickerhoff
Yumi
Zacharia
Zaha Hadid Architects
Zaid Star Quality
ZamZam Motors
Zen Builders
Zinc Design LTD

Appendix H

Copies of Regulation 19(1) Consultation Material

Email sent to all consultees on OPDC's consultation database

Public consultation for the Local Plan is now open | Can't see the images? [View online](#)

OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION



Have your say on the Local Plan consultation for Old Oak and Park Royal

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

OPDC is the Local Planning Authority for Old Oak and Park Royal. Part of our responsibilities includes the production of a Local Plan for this area.

The OPDC Local Plan is the key planning policy document and sets out OPDC's strategy for the sustainable development and regeneration of its area as a whole. It includes policies dealing with matters such as the delivery of new homes and jobs and new roads, rail stations, parks, schools, health centres

and utilities infrastructure. This includes consideration of the type, amount and location of new development that could take place and the policies used in determining planning applications that will shape how the area will be developed over the next 20 years.

The revised draft Local Plan is accompanied by a range of supporting studies that have shaped and support the policies being recommended for the area.

Revised draft Local Plan

Thursday

29

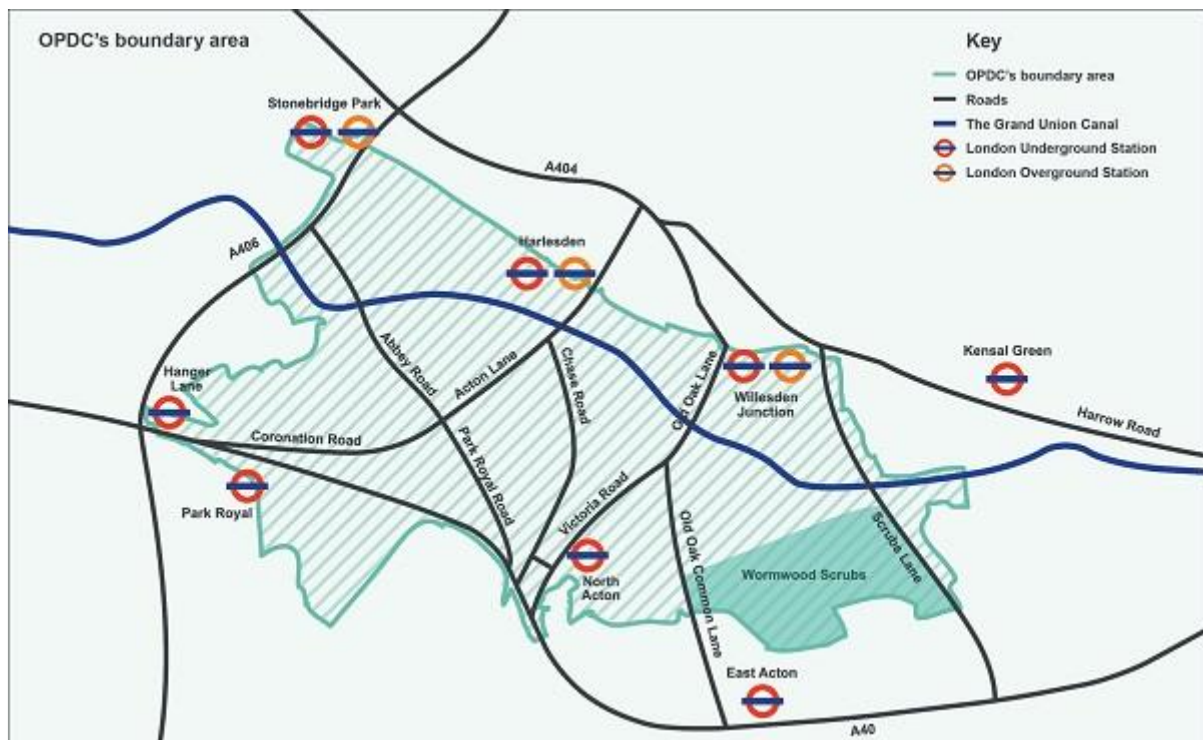
Public consultation now open until 11 September

The document we are consulting on is the revised draft Local Plan (Regulation 19) and its associated supporting studies. The consultation closes at midnight on 11 September.

[Have your say](#)

- Further information on the stages of the Local Plan [can be found online](#)
- OPDC is also consulting on potential sites for inclusion on OPDC's Brownfield Land Register and the revised Validation Checklist

Read the revised draft Local Plan and Supporting Studies



The revised draft Local Plan and supporting documents may be [viewed online](#) or at the following locations during normal office hours:

- Brent Civic Centre, Engineers Way, Wembley HA9 0AF
- City Hall, Queens Walk, London SE1 2AA
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road W5 2HL
- Hammersmith Town Hall, King Street W6 9JU
- Harlesden Library, Craven Park Road NW10 8SE
- The CoClub, The Perfume Factory, 140 Wales Farm Road, North Acton W3 6UG

Alternatively, hard copies of the Local Plan can be made available on request by contacting OPDC either [via email](#) or by post.

How to comment

To make comments on the revised draft Local Plan consultation, and associated documents, please use one of the following methods, providing your full name and contact details:

- **Online:** [response form](#)
- **Email:** localplan@opdc.london.gov.uk

- **Post:** Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen’s Walk, London SE1 2AA

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



What to consider when responding

Responses provided as part of this consultation should consider whether the plan meets legal and procedural requirements, the Duty to Co-operate and whether it is ‘sound’, and the reasons why. [Please see further detail on these criteria.](#)

[Find out more, including how to be informed at future stages](#)

Come along to a consultation event

[Dates throughout](#)

We're hosting a series of drop in sessions and presentation events during the consultation

July

If you're not able to come to an event in July, we're also holding two live Twitter sessions on Tuesday 18 July and Tuesday 5 September, both at 1.00pm to 2.00pm. You can talk to us using #OPDClocalplan.

[Register to attend a consultation event](#)

Date and Time	Event details	Location
Wednesday 5 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's spatial vision and place policies .	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Monday 10 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's housing policies .	City Mission 2 Scrubs Lane NW10 6RB
Saturday 15 July Drop in from 10.00am - 2.00pm	Drop in An opportunity to talk to OPDC officers, view information boards and respond to the consultation.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Wednesday 19 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's social infrastructure and open space policies .	The Collective Old Oak Lane NW10 6FF
Thursday 20 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's employment and town centre policies .	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Monday 24 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's transport policies .	City Mission 2 Scrubs Lane NW10 6RB
Wednesday 26 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's design and environment policies .	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG

#OPDClocalplan





Contact us

Old Oak and Park Royal Development
Corporation (OPDC), City Hall, The Queen's Walk,
London SE1 0LL

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Copy of letter send to local residents and businesses



City Hall
The Queen's Walk
More London
London SE1 2AA
020 7983 5732
www.london.gov.uk

29 June 2017

Dear occupant

Have your say on how the Old Oak and Park Royal Development Corporation (OPDC) promote and guide development and regeneration in the area.

OPDC is the local planning authority for Old Oak and Park Royal. Part of our responsibilities includes the production of a revised draft Local Plan for this area.

The revised draft Local Plan sets out a series of planning policies to help shape the development of the area over the next 20 years. We are starting a public consultation on OPDC's revised draft Local Plan for the area. The legal requirements and technicalities regarding the revised draft Local Plan are set out below. We have also enclosed a leaflet, that we hope will better inform and enable you to have your say in the future of Old Oak and Park Royal.

Alongside the revised draft Local Plan, OPDC is also consulting on a revised Validation Checklist and potential sites for inclusion on OPDC's Brownfield Land Register (BLR).

A Validation Checklist sets out the documents that planning applicants must submit as part of their application in order for it to be valid. National Planning Practice Guidance (14-043-20140306) requires local planning authorities to review their Validation Checklist at least every 2 years. OPDC is taking this opportunity to consult on this list in order to align it to the requirements of the revised draft Local Plan.

The Government now requires all local planning authorities to publish a BLR, which identifies areas of previously developed land that could be available for development. OPDC's Development Capacity Study forms a key part of the evidence base for the revised draft Local Plan. It is intended that this study will form the basis for the publication of Part 1 of the BLR, in accordance with Town and Country Planning (Brownfield Land Register) Regulations 2017.

Further details on the revised Validation Checklist and BLR consultations can be found on OPDC's website. Responses to both of these can be submitted via the online form, email and postal address set out below.

**PUBLIC CONSULTATION
(Revised draft Local Plan)**

Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Revised Draft Local Plan for the Old Oak and Park Royal Development Corporation

Notice is hereby given, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that the Old Oak and Park Royal Development Corporation (OPDC) has produced a revised draft version of the Old Oak and Park Royal Local Plan for public consultation.

Title of the Document:

The OPDC revised draft Local Plan.

Purpose of the document:

OPDC's Local Plan is the key planning policy document for the OPDC area (as shown on the map in the

enclosed leaflet). It contains policies that, together with the London Plan, the National Planning Policy Framework and any related policy and guidance documents, will be used in determining planning applications and will shape how the area will be developed and regenerated over the next 20 years.

This document is the Regulation 19 draft of the Local Plan. The first draft of the Local Plan, known as the Regulation 18 draft, underwent public consultation in February – March 2016. The responses to the consultation have informed the production of this revised draft Local Plan.

Subject Matter and Area of the Development Plan Document:

The revised draft Local Plan includes policies dealing with matters such as the delivery of new homes and jobs and new roads, rail stations, parks, schools, health centres and utilities infrastructure. It is accompanied by a range of supporting studies that support the policies being recommended for the area. The Local Plan covers the whole of the OPDC's boundary area.

Period within which representations and responses need to be made:

Thursday 29 June 2017 until midnight on Monday 11 September 2017.

How to comment and have your say:

Make comments on the revised draft Local Plan, and associated documents (including the revised Validation Checklist and Development Capacity Study, containing BLR information), using one of the following methods, providing your full name and contact details:

- **Online response form:** www.bit.ly/OPDCReg19
- **Email:** localplan@opdc.london.gov.uk
- **Post:** Local Plan Consultation, OPDC, City Hall, Queen's Walk, London SE1 2AA

Want to be kept informed about the next stages?

You can ask to be notified at a specified address for any of the following:

- When we submit the policies for independent examination;
- When the Inspector publishes his/her comments; and/or
- When the policies have been adopted.

How to find out more:

The revised draft Local Plan and supporting documents may be viewed online at: www.london.gov.uk/OPDClocalplan or at the following locations during normal office hours:

- Brent Civic Centre, Engineers Way, Wembley HA9 0AF
- City Hall, Queens Walk, London SE1 2AA
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road W5 2HL
- Hammersmith Town Hall, King Street W6 9JU
- Harlesden Library, Craven Park Road NW10 8SE
- The CoClub, The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG

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

Further details on the purpose of the Local Plan, how to respond and details for our drop in and presentation events can be found in the enclosed leaflet. Alternatively, please contact OPDC via email localplan@opdc.london.gov.uk or on 020 7983 5732.

Yours sincerely,



Tom Cardis
Head of Planning Policy
Old Oak and Park Royal Development Corporation

Copy of leaflet send to local residents and businesses

OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION


Have your say on the Local Plan for Old Oak and Park Royal

A once in a lifetime regeneration and development
project to create a new place for all Londoners

Public
consultation
open 29 June –
11 September
2017

MAYOR OF LONDON

The Old Oak and Park Royal Development Corporation (OPDC) was established by the Mayor of London in April 2015 to oversee the delivery of 25,500 new homes and generate 65,000 new jobs for London.


25,500
 New homes for Londoners

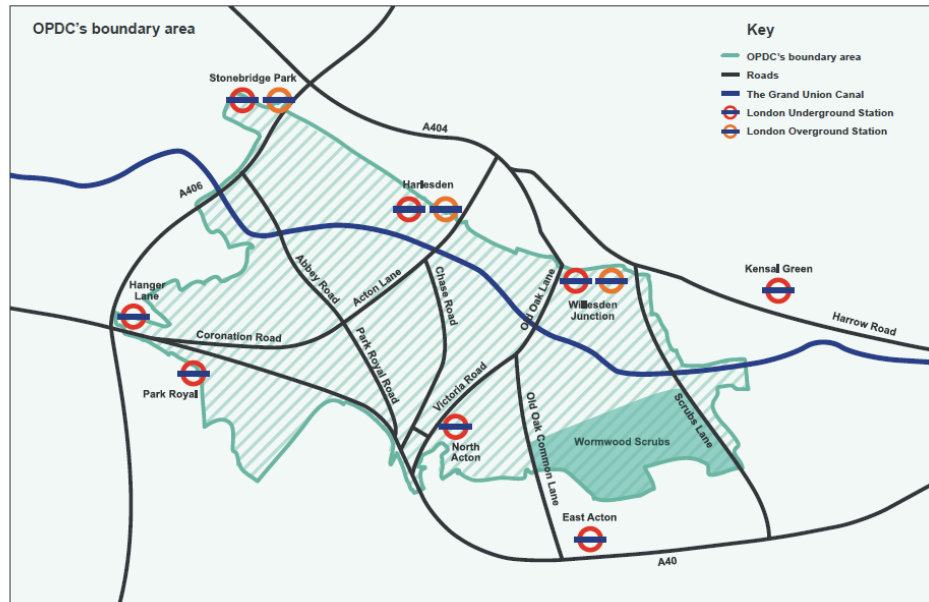

 New health centres, sports and community facilities and schools


 Protecting and strengthening Park Royal

Over the next few decades, we want to make sure that both current and future residents and businesses benefit from the significant investment in the area by High Speed 2 (HS2) and the Elizabeth Line (formerly named Crossrail).

As the local planning authority for the area, we'll build on this investment by:

- transforming and developing the Old Oak area - one of London's most inaccessible areas into a well-connected, world-class transport interchange
- enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued amenity space
- protecting, strengthening and intensifying Park Royal for industrial uses
- protecting and sensitively improving Wormwood Scrubs common and the Grand Union Canal



What's the purpose of the Local Plan?

OPDC is the local planning authority for Old Oak and Park Royal and is responsible for the production of a Local Plan for this area.

The OPDC Local Plan will cover the next 20 years and sets out OPDC's strategy for the sustainable development and regeneration of its area as a whole. This will include consideration of the type, volume and location of new development that could take place and the policies to which applications for planning permission need to conform.

The Local Plan includes a range of policies dealing with matters such as the delivery of new homes, jobs, streets, rail stations, parks, schools, health centres and utilities infrastructure. It is accompanied by supporting studies that support the policies being recommended for the area.

In particular, the Local Plan sets out how regeneration should deliver a highly connected part of London and create a great place to live, work and visit. This document will play an important role in shaping west London's future and help to drive national economic growth.

The Local Plan will demonstrate how the development and regeneration in the area should look to pioneer excellence in sustainability, health and wellbeing, design quality and deliver tangible benefits to both local communities and London as a whole.



Details on where you can view the Local Plan and its associated studies can be found online at: www.london.gov.uk/OPDClocalplan

The stages of creating a Local Plan for Old Oak and Park Royal

Projected stages of the OPDC Local Plan:

The document we are consulting on and want your views to is the revised draft of the Local Plan.

The first draft of the Local Plan underwent public consultation in February – March 2016. We received over 2,000 responses from this consultation which were vital to creating this latest version of the Local Plan.



Independent Examination

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

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

As part of this Independent Examination the following criteria will be used for the policies in the revised draft Local Plan:

Positively Prepared: The Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective: The plan should be deliverable over its period based on effective joint working on cross-boundary strategic priorities.

Consistent with National Policy: The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and the supporting National Planning Practice Guidance.

We want to hear your views

The revised draft Local Plan is now ready for the next consultation phase and we would like to hear from you before it is submitted to the Secretary of State for an Independent Examination.

When responding to this consultation, please use the criteria (as outlined under the Independent Examination section) to demonstrate whether you think that the policies in the revised draft Local Plan have been positively prepared, justified, effective and/or are consistent with national and regional policy and the reasons why.

Hard copies of the revised draft Local Plan are also available for public inspection, get in touch for more information.

How to make a comment:

To make comments on the revised draft Local Plan, and associated documents, please use one of the following methods, providing your full name and contact details, from 29 June to midnight on 11 September 2017:

- Online response form: www.bit.ly/OPDCReg19
- Email: localplan@opdc.london.gov.uk
- Post: Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA


How your information will be used

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






Come along to one of our consultation events

OPDC is hosting a series of drop in and presentation events during the consultation. If you would like to attend, register at: www.bit.ly/OPDCReg19events

<p>Wednesday 5 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm</p>	<p>Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's spatial vision and place policies.</p>	<p>The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG</p>
<p>Monday 10 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm</p>	<p>Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's housing policies.</p>	<p>City Mission 2 Scrubs Lane NW10 6RB</p>
<p>Saturday 15 July Drop in from 10.00am - 2.00pm</p>	<p>Drop in An opportunity to talk to OPDC officers, view information boards and respond to the consultation.</p>	<p>The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG</p>
<p>Wednesday 19 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm</p>	<p>Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's social infrastructure and open space policies.</p>	<p>The Collective Old Oak Lane NW10 6FF</p>
<p>Thursday 20 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm</p>	<p>Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's employment and town centre policies.</p>	<p>The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG</p>
<p>Monday 24 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm</p>	<p>Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's transport policies.</p>	<p>City Mission 2 Scrubs Lane NW10 6RB</p>
<p>Wednesday 26 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm</p>	<p>Drop in and presentation An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's design and environment policies.</p>	<p>The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG</p>

 If you are not able to come to an event, we will also be holding two live Twitter sessions on Tuesday 18 July and Tuesday 5 September, both at 1.00pm – 2.00pm. You can talk to us then using #OPDCLocalPlan.

Contact us:

 @OldOakParkRoyal
 facebook.com/OldOakParkRoyal
 info@opdc.london.gov.uk
 020 7983 5732
 london.gov.uk/opdc

Copy of public notice placed in local newspapers

PUBLIC CONSULTATION (Revised Draft Local Plan)

Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Revised Draft Local Plan for the Old Oak and Park Royal Development Corporation

Notice is hereby given, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that the Old Oak and Park Royal Development Corporation (OPDC) has produced a revised draft version of the Old Oak and Park Royal Local Plan for public consultation.

Alongside the revised draft Local Plan, OPDC is also consulting on a revised Validation Checklist and potential sites for inclusion on OPDC's Brownfield Land Register (BLR).

Title of the Document:

The OPDC revised draft Local Plan.

Purpose of the document:

OPDC's Local Plan is the key planning policy document for the OPDC area. It contains policies that, together with the London Plan, the National Planning Policy Framework and any related policy and guidance documents, will be used in determining planning applications and will shape how the area will be developed over the next 20 years.

This document is the Regulation 19 Draft of the Local Plan. The first draft of the Local Plan, known as the Regulation 18 draft, underwent public consultation in February – March 2016. The responses to the consultation have informed the production of this revised draft of the Local Plan.

Subject Matter and Area of the Development Plan Document:

The revised draft Local Plan includes policies dealing with matters such as the delivery of new homes and jobs and new roads, rail stations, parks, schools, health centres and utilities infrastructure. It is accompanied by a range of supporting studies that support the policies being recommended for the area. The Local Plan covers the whole of the OPDC's administrative area.

Period within which representations and responses need to be made:

Thursday 29 June 2017 until midnight on Monday 11 September 2017.

How to comment and have your say:

To make comments on the revised draft Local Plan, and associated documents (including the revised Validation Checklist and Development Capacity Study containing BLR information), please use one of the following methods, providing your full name and contact details:

- Online response form: www.bit.ly/OPDCReg19
- Email: localplan@opdc.london.gov.uk
- Post: Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA

Want to be kept informed about the next stages?

You can ask to be notified at a specified address of any of the following:

- When we submit the policies for independent examination;
- When the Inspector publishes his/her comments; and/or
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How to find out more:

The revised draft Local Plan and supporting documents may be viewed online at:

www.london.gov.uk/OPDC/localplan or at the following locations during normal office hours:

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- City Hall, Queens Walk, London SE1 2AA
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- Hammersmith Town Hall, King Street W6 9JU
- Harlesden Library, Craven Park Road NW10 8SE
- The CoClub, The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG

Alternatively, hard copies of this Local Plan can be made available on request by contacting OPDC, either via email or by post (see above).

Further details on the purpose of the Local Plan, how to respond and details on drop-in and presentation events can be found on OPDC's website. Alternatively, please contact OPDC via localplan@opdc.london.gov.uk or on 020 7983 5552.

Twitter and Facebook posts promoting the first Regulation 19 consultation

OldOakParkRoyalDevCo @oldoakparkroyal · 5 Sep 2017

We're here and ready for all your #OPDClocalplan questions. Do send them through!



5 retweets 5 likes

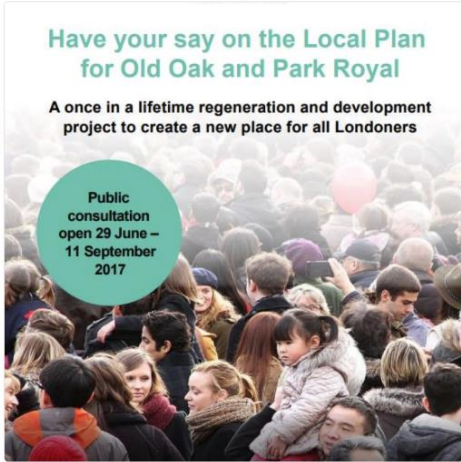
OldOakParkRoyalDevCo @oldoakparkroyal · 5 Sep 2017

Don't forget to send in #OPDClocalplan questions for our live Twitter session from 1.00pm to 2.00pm today #haveyoursay #OldOak #ParkRoyal

4 retweets 2 likes

OldOakParkRoyalDevCo @oldoakparkroyal · 7 Aug 2017

Not responded to the #OPDClocalplan but want to find out more about it? Read our handy leaflet & then #haveyoursay: bit.ly/RDLocalPlanlea...



3 retweets 3 likes

OldOakParkRoyalDevCo @oldoakparkroyal · 4 Aug 2017

Miss the #OPDClocalplan consultation events? Not to worry, all the presentations & exhibition boards are online:

OPDC revised draft Local Plan

The public consultation on the revised draft Local Plan & associated supporting studies runs from 29 June to 11 Sep '17.

london.gov.uk

1 retweet 2 likes

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OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Old Oak and Park
Royal Development
Corporation
@OldOakParkRoyal

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Create a Page

Old Oak and Park Royal Development Corporation added 3 new photos — [3](#) attending OPDC revised draft Local Plan: employment & town centre policies.

20 July 2017 · 🌐

Today's drop in session has started - do pop in and join us The CoClub. The presentation will be starting at 7pm and is focused on employment & town centres #OPDClocalplan <https://t.co/hsB3hQvA5y>



Like Comment