

List of Representations to Regulation 19(2) Consultation

LOCAL PLAN EXAMINATION DOCUMENT

October 2018



MAYOR OF LONDON

OPDC Second Revised Draft Local Plan Consultation: List of Representations

OPDC consulted on the second revised draft Regulation 19(2) Local Plan from the 14th June to the 30th July 2018, receiving 90 individual responses containing 1,630 individual comments. This document presents all representations made as part of the consultation. Representations have been organised by the Local Plan Chapter, Policy and Supporting Study which they relate to. The 'Res. Ref.' column indicates the response reference number attributed to each individual response, while the "Com. Ref" column indicates the comment reference number which has been attributed to each individual comment.

This list of representations should be read alongside the list of representations on the first revised draft Regulation 19 (1) Local Plan which has been published as a separate document. Where a respondent to the Regulation 19 (2) consultation has previously made a representation to both Regulation 19 (1) consultation, the same response reference number has been applied.

To comply with the requirements of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) the names of those who submitted responses as part of the consultation are required to be published alongside their response.

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Res. Ref.	Respondent Type	Reg 19 (1) Respondent?	First Name	Second Name	Organisation	On behalf of
6	Local Resident	Yes	Robert	Covell		
9.b	Statutory Consultee	Yes (New Contact/Agent)	Katie	Parsons	Historic England	
13	Strategic Partner	Yes	Paul	Gilfedder	HS2 Ltd.	
14.b	Planning Consultant	Yes (New Contact/Agent)	Ashley	Collins	JLL	Imperial College
16	Community Group	Yes	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs	
17	Strategic Partner	Yes	Debbie	Fifer	Canal & River Trust	
19.b	Local Resident	Yes (New Contact/Agent)	Roger	Still	The Inland Waterways Association - Middlesex Branch	
21.b	Planning Consultant	Yes (New Contact/Agent)	Nick	Sharpe	Montagu Evans	Boropex Holdings Ltd
22	Interest Group	Yes	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice	
23	Local Authority	Yes	Muhammed	Butt	London Borough of Brent	
25	Agent	Yes	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited
26	Strategic Partner	Yes	Archie	Onslow	North London Waste Plan	
27	Planning Consultant	Yes	Claire	Treanor	Treanor Consulting	Castlepride Limited
28	Strategic Partner	Yes	Lucinda	Turner	Transport for London	
29	Planning Consultant	Yes	Dan	Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner
30	Local Authority	Yes	Steve	Barton	London Borough of Ealing	
32	Local Resident	Yes	Bernie	Timmins		
33	National Body	Yes	Mark	Furnish	Sport England	
35.b	Planning Consultant	Yes (New Contact/Agent)	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments
36	Statutory Consultee	Yes	Julietta	McLoughlin	Mayor of London	
42	Planning Consultant	Yes	Jonathan	Smith	DP9	Old Oak Park Limited
43	Planning Consultant	Yes	Hannah	Willcock	DP9	A40 Data Centre B.V
47	Local Authority	Yes	Jonathan	Wade	Royal Borough of Kensington and Chelsea	
50.b	Statutory Consultee	Yes (New Contact/Agent)	Donatella	Cillo	Environmental Agency	
51	Local Resident	Yes	Stuart	McCaffer		
55	Agent	Yes	Jonathan	Stoddart	CBRE	Segro
56	Local Authority	Yes	Matt	Butler	London Borough of Hammersmith and Fulham	
76.b	Strategic Partner	Yes (New Contact/Agent)	Duncan	Green	Diocese of London	
82	Neighbourhood Forum	Yes	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum	
89	Local Resident	Yes	Nicky	Guymer		
90	Local Resident	Yes	John	Cox		
91	Local Resident	Yes	Bruce	Stevenson		
92.b	Community Group	Yes (New Contact/Agent)	Melanie	Whitlock	The Hammersmith Society	
93	Residents Association	Yes			Wells House Road Residents Association	
94	Local Resident	Yes	Oonagh	Heron		
95	Local Resident	Yes	Mark	Walker		
98.b	Strategic Partner	Yes (New Contact/Agent)	Luke	Burroughs	Transport for London Commercial Development	
99	Residents Association	Yes	John	Haston	West Twyford Residents Association	
100	Neighbourhood Forum	Yes	Mark	Walker	Old Oak Interim Neighbourhood Forum	
101	Local Resident	Yes	Jason	Salkely	Local Resident	
103	Local Resident	Yes	David	Turner		
105	Community Group	Yes	Del	Brenner	Regents Network	
107	Residents Association	Yes	Mark	Walker	TITRA	
110. b	Community Group	Yes (New Contact/Agent)	Robin	Brown	Grand Union Alliance	

Res. Ref.	Respondent Type	Reg 19 (1) Respondent?	First Name	Second Name	Organisation	On behalf of
113	Local Resident	Yes	Thomas	Dyton		
114	Residents Association	Yes	Ewa	Cwirko-Godycka	Midland Terrace Residents	
115	Local Resident	Yes	Nye	Jones		
118	Planning Consultant	Yes	Rory	McManus	Turley	Ashia Centur Limited
119	Strategic Partner	Yes	Wesley	Harcourt	Wormwood Scrubs Charitable Trust	
120	Neighbourhood Forum	Yes	Leão	Neto	Harlesden Neighbourhood Forum	
201	Local Resident	No	Maria	Lonergan		
202	Planning Consultant	No	Matt	Randall	Planning Insight	Owner of 247 Acton Lane
203	Local Resident	No	King Wei	Ling		
204	Local Resident	No	Anita	Ringsell		
205	Local Resident	No	Theresa	Magee	Wesley Estate Residents Association	
206	Community Group	No	Jo	Winters	Ealing Civic Society	
207	Utilities Provider	No	Richard	Hill	Savills	Thames Water
208	Local Resident	No	Chris	Bell		
209	Planning Consultant	No	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited
210	Local Resident	No	Gail	Dobinson		
211	Local Resident	No	Catherine	Goodall		
212	Local Resident	No	Natasha	Salkey		
213	Local Resident	No	Rachel	Ritfeld		
214	Local Resident	No	Ciara	Solmi		
215	Local Resident	No	Eileen	Walsh		
216	Local Resident	No	Teresa	De La Rosa		
217	Local Resident	No	Jean	Lewis		
218	Local Resident	No	Liz	Abraham		
219	Local Resident	No	Jane	Dreaper		
220	Local Resident	No	M.	Szoke		
221	Local Resident	No	James	Trew		
222	Local Resident	No	Stephanie	Hewett		
223	Local Resident	No	Eileen	Hannington		
224	Local Resident	No	Alison	Brayshaw		
225	Local Resident	No	Marta	Donaghey		
226	Planning Consultant	No	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team
227	Local Resident	No	Jamie	Sutcliffe		
228	Local Resident	No	Pablo	Navarrete		
229	Local Resident	No	Alan	Goodearl		
230	Statutory Consultee	No	Malcolm	Souch	NHS London Healthy Urban Development Unit (HUDU)	
231	Local Resident	No	Eric	Leach		
232	Community Group	No	Ilinca	Diaconescu	London Gypsies & Travellers	
233	Local Resident	No	Pendle	Harte		
234	Local Resident	No	Elaine	Gristock		
235	Planning Consultant	No	Jamie	Bryant	Indigo	Aberdeen Standard Investments
236	Neighbourhood Forum	No	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum	
237	Residents Association	No	Sheela	Selvajothy	West Acton Residents Association (WARA)	
238	Local Authority (Waste)	No	Jonathan	Wade	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington & Chelsea	
239	London Assembly Member	No	Sian	Berry	London Assembly	
240	Local Resident	No	Allesia	Stevani		

General Comments

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Comment
14.b	32	Planning Consultant	Ashley	Collins	JLL	Imperial College	General	Imperial College London welcomes the opportunity to comment on the revised draft Local Plan for Old Oak and Park Royal. Imperial College London supports the regeneration proposals for Old Oak. The ambition of including not only new housing, but a substantial commercial element creating some 40,400 jobs is particularly welcomed. The draft Local Plan clearly identifies enormous potential to make Old Oak one of the most accessible locations in London, thereby underpinning the ambitions for this location to accommodate some of the future growth of London. Nonetheless, achieving a comprehensive regeneration of this complex area is fraught with difficulty and challenges. Imperial College London supports the OPDC in its strategic planning of this area, as such an approach is what is required to undertake the enormous level of coordination and commitment that is going to be needed by a large number of parties. The draft Local Plan starts to provide some of the framework that will be needed.
14.b	33	Planning Consultant	Ashley	Collins	JLL	Imperial College	General	For its part, Imperial College London is already investing heavily in the regeneration of White City, which lies just to the south. Some of the substantial investment is already well advanced. The largest Molecular Sciences Research Hub in the UK has recently opened on the north part of the campus at White City. Standing alongside it, the new Translation and Innovation Hub is already providing space for spin-outs, start-ups, scale-ups and established companies. It includes incubator facilities for graduates setting up their own companies when they leave Imperial College London, in order to translate some of their research so that it can benefit society. In addition to these two key buildings, a new Biomedical Engineering Research Hub is under construction on the North Campus, made possible thanks to a £40 million charitable donation from Sir Michael Uren. It will house life-changing research to deliver new and affordable medical technology, helping people affected by a diverse range of medical conditions. It will seek to address global health and well-being challenges, with the development of new devices and techniques that will be invented to restore the quality of life of patients at a sustainable cost. These new buildings are only the beginning and Imperial College London is bringing forward further plans where new partnerships and research with major corporations, other academic institutions, entrepreneurs and businesses, will come together. Imperial College London wants the regeneration of Old Oak to be a success, with good links to its new White City campus, not only in terms of transport, but also in terms of its function. Imperial College London considers that there is scope for Old Oak to accommodate new research and development, life sciences, medical and high-tech companies, in addition to protecting and nurturing the existing industrial and warehousing space focused around Park Royal. This would help to make the area a success, not only locally, but also in terms of its position and role within London.
14.b	34	Planning Consultant	Ashley	Collins	JLL	Imperial College	General	Although wanting to take an active role in making these representations, Imperial College London is not suggesting that the draft Local Plan is unsound. Nor does it consider that the legal and procedural requirements have not been met; or that OPDC has failed in its Duty to Cooperate. However, there is the occasional error that needs correcting and Imperial College London asks that in the final drafting, consideration is given to the following comments made in respect of the key areas set out below.
23	104	Local Authority	Muhammed	Butt	London Borough of Brent		General	Thank you for the opportunity to comment on the Old Oak and Park Royal Local Plan. Brent Council has sought to play a positive role in supporting the development of the Plan through on-going engagement at an officer and member level. The Council commented on the 1st Regulation 19 Local Plan in its letter dated 11th September 2017 (attached as Appendix A for ease of reference). This response does not repeat these comments but focuses on the amendments in the 2nd Regulation 19 Local Plan and the extent to which our previous objections have been addressed. We welcome changes to policy H9 Specialist Housing to prevent the loss of specialist housing which is meeting a local need. However, we object to aspects of the following policies which we consider unsound: H2: Affordable Housing; TCC1: Locations for and Impacts of Town Centre Uses; TCC3: A-Class Uses; P2: Old Oak North; SP10: Integrated Delivery; E2: Employment Sites Outside of SIL; E3: Supporting Small Businesses and Start Ups; TCC4: Social Infrastructure; P6: Park Royal Centre; P7: North Acton and Acton Wells; D5: Tall buildings supporting text
23	135	Local Authority	Muhammed	Butt	London Borough of Brent		General	We hope to engage positively in advance of the Examination hearings to discuss a way forward in relation to our objections. Please note Brent Council wishes to be notified of submission and appear at the Examination hearings.
118	169	Planning Consultant	Rory	McManus	Turley	Ashia Centur Limited	General	We note that the evidence base has been updated for a range of topic areas and we would like to maintain our right to submit further representations in due course as the review of the Local Plan progresses and appear at the Local Plan Examination.
118	170	Planning Consultant	Rory	McManus	Turley	Ashia Centur Limited	General	It is not proposed to reiterate the background and context which was previously provided in detail within representations dated 25 September 2016 on the previous revised draft Local Plan Regulation 19 Consultation. We would however like to take the opportunity to note that the latest version of the draft Local Plan still does not take into account the key recommendations within our previous representations.
42	181	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	General	OOP Ltd is the largest private land owner within Old Oak Common and is preparing a masterplan for one of the most strategically important sites in the area. The 46-acre site (known as Old Oak Park 'OOP') lies at the heart of the Old Oak Common regeneration area, covering a significant proportion of the land to the north of the Grand Union Canal. The site is currently home to the world's largest car dealership and processing plant, Cargiant, which directly employs 850 people and supports many more obs in the local area. Cargiant is already underway with its plans for relocation, following detailed discussions with the OPDC and other decision makers and stakeholders over the past three years. We are ready to progress with our masterplan for OOP as soon as certainty on the key elements of transport infrastructure is provided. Our ability to progress with a planning application has been delayed by the latest round of revisions to the Local Plan informed by the Masterplan Framework prepared by AECOM. OOP made representations on the previous drafts of the Local Plan, and I enclose our representations on the First Revised Draft for reference. We welcome the opportunity to make representations on the Second Revised Draft, and look forward to continued engagement throughout the remainder of the Local Plan process. We appreciate the detailed engagement that we have had with the OPDC on the development of the Plan, and welcome the changes that have been made in response to some of our comments on the previous draft.
42	182	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	General	We continue to lend our support to the Plan as a whole and to the support it provides for bringing forward development at OOP, but remain keen to ensure that the Plan properly reflects some fundamental matters that are critical to the OOP site coming forward for development.
42	183	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	General	Whilst we welcome the acknowledgement of the considerable infrastructure costs required to bring forward development at OOP, we remain concerned that the Local Plan sets an unachievable target for affordable housing (50%) which does not reflect the considerable challenges and costs involved in delivering development at OOP. Whilst the Local Plan states that affordable housing is subject to viability, the headline target is based on an evidence base which does not seem to take account of the significant cost of infrastructure

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42	184	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	General	We welcome the reduction in length of the Plan and the removal of some elements of repetition. However, it remains a long and detailed Local Plan which we continue to feel exceeds the requirements contained in most other Local Plans in London and continues to seek control of elements that extend beyond the remit of planning. We understand that this reflects OPDC's high aspirations for new development, which we applaud, however this does risk making development in the OPDC area more burdensome when it should be more streamlined. The Plan's manifesto is change, and so we are keen to work with the OPDC to ensure that this is reflected in the detailed requirements of planning applications
42	185	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	General	The OOP site will provide a considerable proportion of the total targets of 26,500 homes and 40,400 jobs to be delivered in OPDC. It is the most significant private development in the area, and the Local Plan requires that it provide a significant amount of social and transport infrastructure. However, much of this infrastructure serves the wider area, including; a 4FE primary school for the whole area, a 1,564sq m health hub for the whole area, a sports and leisure centre including a 25m swimming pool for the whole area and a community hub of 2,600sq m for the whole area. In order for these allocations to be acceptable and deliverable, we are of the view that there needs to be a clear acknowledgement of the fundamental viability challenges involved in developing OOP, and how this will influence the level of affordable housing that the scheme will be able to provide
42	186	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	General	The masterplan framework for Old Oak North no longer reflects the draft masterplan proposals developed by OOP through three years of close, collaborative working. Whilst we appreciate that elements of this change in approach provide benefits to delivery, we also consider that some of the changes have significant delivery challenges which are not yet fully understood or explained in the Local Plan. We require increased certainty on key elements of infrastructure, now identified as requirements within the Local Plan, in order that we can progress with the design of a new masterplan for OOP to allow for the preparation of a planning application
42	187	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	General	In summary, we consider that there is much for us to support in the Second Revised Draft Local Plan, but there remain some key areas where we would welcome further engagement with the OPDC before the document is finalised and adopted. In particular, the way in which the Plan utilises the Masterplan Framework Principles document produced by AECOM and the recommendations this document makes for the provision of key elements of infrastructure within Old Oak North. As such, whilst we do not question that the Plan has been positively prepared, we do consider that it is not fully justified in places and that, as a result, some further work is required in order for it to be effective.
16	245	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		General	We have commented only on those parts of this Plan which seem directly material to the Scrubs and have quoted extracts from Plans in bold. We have tried to confine our comments to (a) significant changes in this Plan from the last Plan (b) where we had anticipated some change but there has been none. We wish our comments on the last Plan still to apply.
36	277	Statutory Consultee	Julietta	McLoughlin	Mayor of London		General	You will be aware that the Mayor published his draft London Plan for consultation on 1st December 2017. It is anticipated that the Examination in Public of the London Plan will take place in Winter 2018/19 with publication in Spring 2020. Once published, the new London Plan will form part of OPDC's Development Plan and contain, where relevant, the most up-to-date policies. OPDC's Local Plan is required to be in general conformity with the current London Plan, however its policies will need to be considered alongside the draft London Plan. The draft London Plan and its evidence base is a material consideration in planning decisions, and gains more weight as it moves towards publication. In this regard, the Mayor welcomes the fact that OPDC have, through this second Regulation 19 version, made amendments to reflect the draft London Plan.
36	287	Statutory Consultee	Julietta	McLoughlin	Mayor of London		General	The Mayor considered that the proposed release of Strategic Industrial Land was broadly consistent with the identified pipeline in the GLA's Industrial Land Supply and Economy study (2016) and the GLA's Industrial Land Demand Study (2017). Much of this land is surplus railway infrastructure land.
115	292	Local Resident	Nye	Jones			General	I would like to make it known that I am extremely concerned about the Old Oak & Park Royal Development Corporation's draft Local Plan and would like to register a complaint It seems underhanded at best in the way the information has been presented and there are many concerns from my point of view. We have collectively put our concerns together as part of the TITRA residents association, and although you have already received contact from them, I felt compelled to write personally as well. The most unacceptable parts of the plan are as follows...
210	302	Local Resident	Gail	Dobinson			General	As a long term resident & owner of a conservation cottage on Old Oak Lane - I object to many of the plans & support the response of TITRA as stated below. Please listen to our community!
212	314	Local Resident	Natasha	Salkey			General	I am a TITRA resident who has been living in this area for 21 years and had seen many changes to this area. I am stunned to learn about the proposed plans of building a minimum of 22,350 additional homes in Old Oak (2018-38). To me it represents over-development and excessive housing density which will overload local infrastructure. We as a community already have been asking our council for help with many issues e.g. vermin, refuse collection and litter... We have plenty of issues at this particular moment that no one is willing to help us with or act upon I dread to think what would happen when the numbers will rise to this unmanageable figure!
213	330	Local Resident	Rachel	Ritfeld			General	About TITRA (The island triangle residents' association) TITRA represents 220 homes in the Old Oak Conservation Area. This area's 19th century cottages are one of only three workers' housing developments left in London. The area is used by Ealing studios as an external filming location for film, TV and music videos.
113	403	Local Resident	Thomas	Dyton	WHRRA (Member)		General	Overall, we are disappointed that the focus on achieving the unrealistic 25,500 homes target has dampened the OPDC vision for creating a truly vibrant and futuristic new neighbourhood for Londoners.
113	425	Local Resident	Thomas	Dyton	WHRRA (Member)		General	Overall, the community has deep concerns over the potential loss of community during development of the OPDC area. We ask OPDC to make a strong commitment to preserving and enhancing our community and offering meanwhile and long-term facilities for bonding our communities together.
92.b	426	Community Group	Melanie	Whitlock	The Hammersmith Society		General	4 The comments we made in September 2017 still apply to this Regulation 19.2 draft and we request they be taken into consideration accordingly. We are commenting here on some key points.
219	441	Local Resident	Jane	Dreaper			General	I would like to add my voice to the below response from TITRA (The Island Triangle Resident Association) - both in my capacity as a committee member and as a householder residing at (-). I'm highly concerned that your proposals could so blatantly ignore and indeed exacerbate many of the issues we are grappling with in this area. I appeal to you to take a fresh look at them, and consider what might actually improve this as a residential environment. I've added my own thoughts in bold/capitals beyond the TITRA points. I would like to be kept informed about this process as I haven't been aware of any previous detailed consultation.

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221	469	Local Resident	James	Trew			General	About TITRA (The island triangle residents' association) TITRA represents 220 homes in the Old Oak Conservation Area. This area's 19th century cottages are one of only three workers' housing developments left in London. The area is used by Ealing studios as an external filming location for film, TV and music videos.
19.b	504	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		General	We note that throughout the Local Plan references to the Mayor of London's Blue Ribbon Network have been deleted and replaced - in most instances - with reference to the Mayor of London's 'All London Green Grid'. We understand this was developed to provide a strategic interlinked network of high quality green infrastructure connecting major employment and residential areas. The ALGG envisages the Paddington Arm of the Grand Union Canal as a Strategic Link connecting West London into Central London. It highlights the specific opportunity to: "enhance links from the Grand Union Canal to nearby open spaces, for walking and cycling and to enhance the role of the Grand Union Canal as a bio-diverse green-blue corridor, particularly through the industrial areas at Park Royal and Hounslow".
93	521	Residents Association			Wells House Road Residents Association		General	Overall, we are disappointed that the focus on achieving the unrealistic 25,500 homes target has dampened the OPDC vision for creating a truly vibrant and futuristic new neighbourhood for Londoners.
93	543	Residents Association			Wells House Road Residents Association		General	Overall, the community has deep concerns over the potential loss of community during development of the OPDC area. We ask OPDC to make a strong commitment to preserving and enhancing our community and offering meanwhile and long-term facilities for bonding our communities together.
223	555	Local Resident	Eileen	Hannington			General	About TITRA (The island triangle residents' association) TITRA represents 220 homes in the Old Oak Conservation Area. This area's 19th century cottages are one of only three workers' housing developments left in London. The area is used by Ealing studios as an external filming location for film, TV and music videos.
98.b	617	Strategic Partner	Luke	Burroughs	Transport for London Commercial Development		General	TfL CD broadly welcomes the contents of the Local Plan. However, we would welcome the opportunity to meet further with you to discuss these policies in further detail and ensure that the matters we have raised are fully considered.
25	655	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	General	Generally we support the aims and vision of the OPDC and the regeneration of Park Royal. Our comments on various policies are set out below.
25	663	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	General	We trust the enclosed will be taken into consideration in the Local Plan process and, on our client's behalf, reserve the right to make further comments at any future stage.
227	679	Local Resident	Jamie	Sutcliffe			General	To Whom this may concern, Please find enclosed my objections below as we want to keep our neighbour hood clean, safe and protected at all costs. Your plans don't seem to take this into effect and just want to keep on building anything, anywhere and we need to take notice of our thoughts and concerns
28	689	Strategic Partner	Lucinda	Turner	Transport for London		General	Transport for London (TfL) is working closely with OPDC in helping to plan for the Old Oak and Park Royal area. This has included joint work and funding of a significant number of transport studies as well as advice in developing some of the draft transport policies for the Local Plan. There have also been a number of officer and high level discussions on the emerging policy. We look forward to continuing this close working relationship to ensure that the provision of transport infrastructure, services and operations is integrated with the long-term development aspirations for the area.
28	690	Strategic Partner	Lucinda	Turner	Transport for London		General	The following representations provide comments from across TfL that reflect the breadth of TfL's role as the strategic transport authority - as the body responsible for preparing the Mayor's Transport Strategy and the transport elements of the London Plan together with planning and operating London's transport services (including buses, most rail services and cycle hire) and as the strategic highway authority. A separate response is being prepared and submitted by TfL Commercial Development to address TfL's property and development interests in the area.
28	691	Strategic Partner	Lucinda	Turner	Transport for London		General	TfL previously provided responses to the first draft consultation in March 2016 and the first Reg. 19 consultation in September 2017. We are pleased that these responses have been taken into account in the revised draft.
28	692	Strategic Partner	Lucinda	Turner	Transport for London		General	The representations in the table focus on amendments made to the draft Local Plan that TfL either specifically supports or aspects that we would (still) like to see amended. This updates comments made in the previous consultations, reflecting strategic transport policies in the current London Plan (2016) and the draft new London Plan (December 2017), the Mayor's Transport Strategy (MTS) (April 2018) and the latest progress on transport projects in the area.
28	694	Strategic Partner	Lucinda	Turner	Transport for London		General	To more accurately reflect the current status of the potential new London Overground stations at Hythe Road and Old Oak Common Lane TfL is pleased that in some parts of the document they are now referred to as 'potential' new stations. This is important given that they are not yet committed or funded. However, this wording needs to be used consistently throughout the document.
28	697	Strategic Partner	Lucinda	Turner	Transport for London		General	Positive references throughout the Plan to Good Growth and Healthy Streets alongside additional text supporting Mayoral priorities including targets for mode shift are welcomed.
28	713	Strategic Partner	Lucinda	Turner	Transport for London		General	As new London Overground stations are not yet committed or funded, all wording in text and on all figures should refer to Hythe Road and Old Oak Common Station as potential (as per the Transport Chapter)
30	787	Local Authority	Steve	Barton	London Borough of Ealing		General	Ealing greatly supports the efforts made since the last consultation to reduce the size of the plan and eliminate repetition. This is particularly important because it forms part of a shared policy framework with the London Plan, and a shared narrative with neighbouring Borough Local Plans. The proposed changes make the plan considerably clearer and easier to use.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Comment
33	797	National Body	Mark	Furnish	Sport England		General	Sport England has reviewed the Second Revised Draft Local Plan in light of these planning objectives and national planning policy set out in the National Planning Policy Framework (NPPF) and welcome some amendments to the document, particularly in relation to Policy TCC6, although Sport England are concerned with some aspects of these amendments. In addition, many of the concerns raised previously by Sport England have not been adequately addressed in its view and it still considers that there is almost no reference to sport, playing field or pitches, including ancillary provision, in the Spatial Vision, Strategic Policies and Places Policies.
33	798	National Body	Mark	Furnish	Sport England		General	The supporting text to these policies are still vague when referring to indoor and outdoor sport and leisure provision, including when discussing Wormwood Scrubs. The Draft Plan does not mention Active Design which is surprising given the Local Plan identifies Health and Wellbeing as an opportunity in Figure 2.1.
33	799	National Body	Mark	Furnish	Sport England		General	Sport England still does not consider that OPDC have a robust strategic evidence base for sport facilities to base these policies upon. The Policies should be informed by robust and up-to-date strategies for the area the Local Plan covers, such as a Playing Pitch Strategy (PPS) and Built Facility Strategy (BFS), which OPDC does not appear to have produced. As a result, most of Sport England's comments previously raised are still applicable (attached) therefore Sport England does not consider that the Draft Local Plan has been positively prepared or is consistent with national policy and consequently consider it to be unsound. As a result Sport England still objects to the Local Plan Draft as set out in its previous comments and invite OPDC to future consider the matters raised in that submission. Sport England would not reiterate its previous comments but would add the following:
107	887	Residents Association	Mark	Walker	TITRA		General	A misleading Local Plan document TITRA finds that the Local Plan documentation as a whole is unclear and misleading. It is very difficult to find clear statements of intended housing targets and site allocations which can be read across and cross checked from one chapter to another - even though the calculations have clearly been done by OPDC behind the scenes This draft Local Plan should be much clearer and transparent over its development / housing aims and housing densities and furthermore how existing residential areas are to be protected and enhanced within the area's redevelopment.
107	889	Residents Association	Mark	Walker	TITRA		General	About TITRA (The island triangle residents' association) TITRA represents 220 homes in the Old Oak Conservation Area. This area's 19th century cottages are one of only three workers' housing developments left in London. The area is used by Ealing studios as an external filming location for film, TV and music videos.
114	916	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	1.1 We are a neighbourhood in Old Oak, Midland Terrace and Shaftesbury Gardens comprises of a row of Edwardian Houses and flats built in 1990's with around 500 residents. This residential area forms part of the greater Old Oak Neighbourhood Forum which comprises four residential areas. The Collective can also be added into the mix although it is a cross between a business and a residential enclave. All the residents will be heavily impacted by the new developments from the OPDC as well as the HS2 works. Therefore, we also strongly support the responses by all the above groups as well as the Grand Union Alliance and the Old Oak Neighbourhood Forum itself.
114	927	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	3.1 As we understand, it is unusual for a second version of a Regulation 19 Local Plan to be published for consultation. The changes made to the version issued by OPDC in June 2017 are substantial. The OPDC took 9 months to take account of comments made on their 2017 version, which followed a Regulation 18 version consulted on in early 2016 and an Opportunity Area Planning Framework published in 2015. It appears that a number of basic issues around the availability of land within the plan period, the requirements of HS2, Crossrail, Network Rail, and the topography of the area had been insufficiently considered at all these earlier stages.
114	930	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	3.4 Old Oak is London's last chance to create a world class example of sustainable and successful urban renewal. We believe that this opportunity is being largely squandered. We fully support the development of a new part of London at Old Oak but not in the way that the OPDC is currently intent on proceeding. 3.5 As we and others have commented previously, no reasonable alternatives to the direction set by the OAPF and the Regulation 18 OPDC Draft Local Plan have been identified, explored or put before the public by the Development Corporation, since it took on responsibilities as a planning authority in April 2105. The LBHF Local Plan, prior to the removal of content on the area covered by OPDC, offered alternative futures for Old Oak which we argue should be revisited in light of events which have forced changes to OPDC thinking.
114	937	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: • Incorrect identification of policies in the Place chapters of the Draft Plan as 'strategic' when these do not meet the relevant NPPG criteria. This inappropriately limits the scope of neighbourhood plans within the OPDC area, and is contrary to the NPPF.

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114	965	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	<p>13.1 Paragraph 184 of the NPPF states Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. The 19.2 OPDC attempts to meet this requirement by stating at paragraph 1.23 that Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies.</p> <p>13.2 This single sentence is inadequate, and in our view incorrect, in its attempt to identify those policies in the OPDC Dra Local Plan that should be deemed strategic. This was pointed out in previous responses to the 19.1 consultation, but the comment has been ignored.</p> <p>13.3 Clarity as to which policies in a Local Plan are 'strategic' is important to neighbourhood forums preparing a neighbourhood plan, in order that the 'general conformity' test is met. There are two designated neighbourhood areas/forums within the OPDC boundary (Harlesden NF and Old Oak NF). National Planning Policy Guidance deals with the identification of strategic policies as follows: What is meant by strategic policies? Paragraph 156 of the National Planning Policy Framework sets out the strategic matters about which local planning authorities are expected to include policies in their Local Plans. The basic condition addresses strategic policies no matter where they appear in the development plan. It does not presume that every policy in a Local Plan is strategic or that the only policies that are strategic are labelled as such. Paragraph: 075 Reference ID: 41-075-20140306 (Revision date: 06 03 2014) How is a strategic policy determined? Strategic policies will be different in each local planning authority area. When reaching a view on whether a policy is a strategic policy the following are useful considerations: <ul style="list-style-type: none"> • whether the policy sets out an overarching direction or objective • whether the policy seeks to shape the broad characteristics of development • the scale at which the policy is intended to operate • whether the policy sets a framework for decisions on how competing priorities should be balanced • whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan • in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the Local Plan • whether the Local Plan identifies the policy as being strategic Planning practice guidance on Local Plans provides further advice on strategic policies. Paragraph: 076 Reference ID: 41-076-20140306 (Revision date: 06 03 2014). How does a qualifying body know what is a strategic policy? A local planning authority should set out clearly its strategic policies in accordance with paragraph 184 of the National Planning Policy Framework and provide details of these to a qualifying body and to the independent examiner. Paragraph: 077 Reference ID: 41-077-20140306 (Revision date: 06 03 2014)</p>
114	966	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	<p>13.4 OPDC state that they view policies in chapters 3, 4 and 11 as 'strategic'. Chapter 4 covers the 12 'Places' in the OPDC area. Paragraph 4.2 states Policies in this chapter provide specific guidance for each place at a greater level of detail than the Strategic Policies in Chapter 3 and the Development Management policies later in the Local Plan. In light of the NPPG criteria set out above, which define how a strategic policy is determined, we think it self-evident that the 'Place' policies set out in Chapter 4 are 'non-strategic'. They are not concerned with the 'broad characteristics of development'. They are at a very local or neighbourhood scale. They are not 'essential to achieving the wider vision and aspirations of the Local Plan'.</p> <p>13.5 There is a debate to be had on whether the site allocations included in the table at the end of Chapter 3 should in their entirety be deemed 'strategic' and as 'central to achieving the visions and aspirations of the Local Plan'. In practice this issue may not arise at examination of either a Harlesden or an Old Oak neighbourhood plan, given the limited neighbourhood area boundaries designated to date by OPDC. But in a Local Plan with a likely shelf life of 5 years or so, after adoption (a period in which further neighbourhood forums may surface) the 19.2 document needs a much more detailed and justified explanation of which Local Plan policies will need to be considered when the 'general conformity' test is applied.</p> <p>13.6 The new NPPF (which depending on mescales may or may not apply when the OPDC Local Plan is examined) covers these issues at paragraph 21 as follows: Plans should make explicit which policies are 'strategic policies'. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any local policies that may be needed. Those local policies may come forward either as part of a single local plan or as part of a subsequent local plan or neighbourhood plan. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other local policies (our emphasis).</p> <p>13.7 We consider it clear that Government intends that Local Plans, as the most local layer of the English planning system, should leave space for neighbourhood plans to come forward with 'non-strategic' policies.</p> <p>13.8 It is arguable whether all of the content of Chapter 4 of the 19.2 OPDC Local Plan, and its treatment of 12 'Places' within the OPDC area, is appropriate for inclusion within a Local Plan—particularly when further 'development principles' documents on e.g. Old Oak North and on Scrubs Lane are designed to be developed further and adopted as Supplementary Planning Documents.</p> <p>13.9 In any event, we consider the current wording of paragraph 1.23 of the current OPDC 19.2 Draft to be contrary to paragraph 184 of the NPPF and the sections of NPPG quoted above, and as such unsound.</p>
114	967	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	<p>14.1 It is notable that apart from brief references recognising that any 'made' neighbourhood plans form part of the development plan for the area, very little mention is made of neighbourhood planning in the OPDC 19.2 Draft. Even in the more detailed Place chapters, there is no reference to the fact that the Old Oak Neighbourhood Area, designated by OPDC in September 2017, lies partly within Place P9 Channel Gate and partly within Place P8 Old Oak Lane and Old Oak Common Lane. No mention is made of the Harlesden Neighbourhood Area which extends into Place P11 Willesden Junction. None of the many maps in the 19.2 document, even in the Place chapters, show the boundaries of these two neighbourhood areas.</p> <p>14.2 These are statutory designations, of wider planning significance than e.g. conservation areas (which are shown on maps). Paragraph 155 of the NPPF states Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>14.3 Policy DI3 of the current OPDC 19.2 Dra Plan on Stakeholder Engagement and Being a Proactive Planning Authority includes a section on community participation at paragraphs 11.34-11.37. This refers to examples of activity in Tottenham Hale, of little relevance, while making no mention of the two neighbourhood forums designated by OPDC. How can local residents become aware of opportunities for participation and involvement at Old Oak, when the key planning document for the area chooses to ignore a layer of the planning system playing an increasingly significant role across England? These omissions of basic information need to be reflected prior to an Examination in Public.</p>

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114	968	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	15.1 The table summarises those matters on which we consider the 19.2 Draft Plan to fail to meet the statutory requirements, as defined below on the OPDC consultation web page. We have not repeated comments on parts of the Plan previously commented on, and which remain unchanged between the 19.1 and 19.2 versions. 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.
114	974	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	Incorrect identification of policies in the Place chapters of the Draft Plan as 'strategic' when these do not meet the relevant NPPG criteria. The 19.2 OPDC Draft Plan states at paragraph 1.23 that Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general general conformity of neighbourhood planning policies. These policies set out in these Place chapters do not meet the criteria for 'strategic' policies in NPPG 075 & 076. They are 'non-strategic' policies. This aspect of the 19.2 Draft Plan fails to accord with with the requirements of NPPF Paragraph 184.
114	975	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	16.1 The Development Corporation took over planning powers from the three Boroughs on April 2015. The original timetable for preparation of a Local Plan, to replace the relevant sections of those Plans in use by the three Boroughs, was for Regulation 19 consultation to be concluded in summer 2016 (see OAPF paragraph 1.10). While there are understandable reasons for the extended timetable to date, the fact remains that the planning process has slipped by 2 years.
114	976	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	16.2 Were the Examination in Public to conclude that fundamental aspects of the 19.2 Draft Plan are unsound and need further work, there must be real questions as to whether this planning process is going to deliver its intended outcomes. Old Oak and Park Royal cannot be left without a planning framework under which decisions on applications can be made.
114	977	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	16.3 A possible way forward would be for OPDC to focus its energies and capacity on its development role. This would involve progressing the assembly of public land in the area, and preparing a series of masterplans (including the current masterplan for Old Oak North being prepared by the consortium led by AECOM).
114	978	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	16.4 The Corporation has the legal powers to delegate to the three Boroughs decisions on planning applications. It already does so for all minor applications. For reasons which have never been satisfactorily explained to the public, it also delegates back to LB Ealing all decisions on major applications at North Acton. 16.5 In making decisions on major applications, LB Ealing appears to rely very largely on policies in its own 2012 Core Strategy and its 2013 publications on Development Sites and on Development Management, all of which documents form part of its Local Plan. While committee reports on applications acknowledge that major sites at North Acton lie within the OPDC boundary, no reference is made to the OPDC Local Plan or to specific policies within this. These do not appear to be taken into account as 'emerging policy'. 16.6 If this approach to decisions on planning applications is good enough for North Acton, a location undergoing extensive regeneration, why should it not be good enough for Old Oak also? The LBHF Local Plan has recently been reviewed with a new version adopted in February 2018. Specific policy content on the OPDC area was not included in this version, albeit that the Core Strategy 2011 and Development Management Local Plan 2013 are documents which are more up to date than is the case for many Local Plans in daily use across England.
114	979	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	16.7 At the time of the 2014 public consultation on the establishment of a Mayoral Development Corporation for the OPDC area, this Forum opposed the MDC option and favoured new joint working arrangements between the three Boroughs. Had this alternative route been pursued, we believe that LBHF Local Plan policies for the Old Oak part of the OPDC area would now be setting a different, more realistic, and more sustainable course for the future of the area. 16.8 The LBHF Local Plan as drafted back in 2014/5 offered genuine alternative spatial strategies for what the Council defined as the Old Oak Regeneration Area. 6,000 new homes were proposed within the plan period, with a 'potential' total of 18,000. The Regulation 18 Draft offered the public alternative options in a way that the OPDC Local Plan process has failed to do. These included: • Defer the regeneration of parts of the site until suitable transport nodes are operational • Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area. We consider these to have been sensible and appropriate options. Instead the Corporation has pursued a 'vision' for Old Oak which is proving increasingly unrealistic and out of sync with the legislative context and timetable for the HS2 and Elizabeth Line interchange.
114	980	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	16.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority • conflicted between its 'development' mandate and its role in determining planning applications.
114	983	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	16.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority • declining to make changes in response to consistent objections from local residents and community groups
114	985	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	17. After the lifetime of the OPDC, it will be Hammersmith and Fulham that is left as the local authority dealing with the long-term consequences of the Corporation's Local Plan. The Borough Council and its electorate should be granted a far greater say in the planning policies and applications to be decided in the next 5-year period.

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114	986	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	<p>17.1 In our view OPDC should delegate all applications to LBHF while the current 19.2 Local Plan undergoes major revision. Preferably LBHF should be allowed swiftly to prepare a set of development management policies within a 10 year 'meanwhile' Local Plan, covering the period until such time as the HS2/Elizabeth Line opens and outcomes are known on the provision of additional transport infrastructure in the area.</p> <p>17.2 Such a 'meanwhile' Local Plan could provide a novel way of bringing forward development in the area which meets housing and other needs responsively and flexibly, including</p> <ul style="list-style-type: none"> identifying sites for self-build and custom-build housing with a 10-15 year lifespan to accommodate the construction workforce required to build the HS2/Elizabeth Line interchange as well as providing affordable homes for Londoners taking a more flexible approach to protection of SIL within a broad buffer zone along the LBHF and Ealing boundary (including 'Old Park Royal) and allowing mixed use refurbishment and redevelopment of commercial premises. <p>17.3 A combination of the above and further policies would be more likely than the 19.2 Draft to build a sustainable and successful community at Old Oak, integrating existing and new populations. Development would be more evolutionary. Land values would remain lower than the levels resulting from OPDC support for 'transit-oriented high density' development. The pace at which buildings emerged on the ground might also prove faster than under the current planning regime, where build out rates will conform to market practices⁴, in an area where property values are static or falling.</p>
114	987	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		General	<p>'When the facts change, I change my mind. What do you do Sir?'</p> <p>18.1 This possibly apocryphal question by John Maynard Keynes is a relevant one, in relation to Old Oak. The 'facts' have changed a good deal since the OPDC embarked upon its Local Plan. But as a planning authority the OPDC has shown no willingness to consider any change of mind on the 24,000-housing target in the face of accumulating evidence that this number of dwellings simply cannot be accommodated in any reasonable or acceptable way, on the sites available for development.</p> <p>18.2 The Examination in Public of the OPDC Local Plan is the last opportunity that local people have to make their voice heard. Debates at the OPDC Board and Planning Committee have shown little recognition of how the planning context has changed since 2015, or how upwardly revised 'development capacity' and density figures risk creating a part of London seen by future generations as an urban planning disaster.</p>
95	997	Local Resident	Mark	Walker			General	I have never seen public consultation documents that present vital issues such as housing density and heights in such an opaque and misleading way. This plan needs thoroughly rewriting to ensure that there is a transparent discussion of these crucial important issues affecting our local communities.
229	999	Local Resident	Alan	Goodearl			General	There is much that is good in the plans; but I have four areas of concern, all concerned really with links.
230	1004	Statutory Consultee	Malcolm	Souch	NHS London Healthy Urban Development Unit		General	Thank you for the opportunity to comment on the revised draft Local Plan. The following comments are submitted on behalf of the Brent, Ealing, Hammersmith and Fulham and West London Clinical Commissioning Groups (CCGs). The CCGs support the emerging policies and changes made to the July 2017 draft version.
50.b	1010	Statutory Consultee	Donatella	Cillo	Environmental Agency		General	<p>Thank you for consulting us on the Old Oak Common and Park Royal (OPDC) Development Corporation Local Plan - Second revised draft for Regulation 19. We received your email on the 14 June 2018 and we have reviewed the OPDC Local Plan Second revised draft and supporting studies.</p> <p>Environment Agency Position</p> <p>Having reviewed the second OPDC revised draft Local Plan we remain supportive of the policies which are relatively unchanged since the previous regulation 19 consultation and consider the Local Plan to be sound.</p>
50.b	1022	Statutory Consultee	Donatella	Cillo	Environmental Agency		General	<p>Final Comments</p> <p>Once again, thank you for contacting us. As mentioned earlier, we would welcome the opportunity to discuss our comments with you.</p>
55	1048	Agent	Jonathan	Stoddart	CBRE	Segro	General	<p>SEGRO is a UK Real Estate Investment Trust (REIT), and a leading owner, manager and developer of modern warehouses and light industrial property. We own or manage 6.9 million square metres (74 million square feet) of space valued at £10 billion serving customers from a wide range of industry sectors. Our properties are located in and around major cities and at key transportation hubs in the UK and in nine other European countries.</p> <p>More information about SEGRO, and our interests in OPDC, can be found in our representations to the previous Local Plan (first Regulation 19) consultation which is appended.</p>
233	1093	Local Resident	Pendle	Harte			General	As a resident of the TITRA area I am objecting to the Old Oak & Park Royal Development Corporation's draft Local Plan. My main concerns are waste, waste management and population density.
56	1106	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		General	LBHF seeks an ambitious and bold regeneration of the OPDC area, in particular to maximise the benefits and opportunities to improve the quality of life of existing borough residents as well as future residents and businesses. Building thousands of genuinely affordable homes, start-up business space and regeneration of the highest 'green' standards must be an integral part of providing an integrated transport infrastructure and hub of international status.
56	1107	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		General	LBHF also welcomes the close working between officers and members and on-going future joint working to ensure the successful delivery of the aims and objectives of the OPDC.
56	1108	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		General	LBHF remains the Local Authority for a large part of the OPDC area and is still responsible for the delivery of a number of services, including waste, education, and highways. The Council has retained the body responsible for the following areas; the Lead Local Flood Authority, contaminated land, the Air Quality Management Area, the Lead Education Authority, the highways authority and all waste matters. For these reasons, the Council is seeking to ensure we are party to all funding and delivery mechanisms as we will be delivering these services into the future.
56	1109	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		General	It will also be important for OPDC to reflect all LBHF designations on its Policies Map.
56	1110	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		General	In response to the OPDC's second Regulation 19 consultation, the Council attaches a schedule of comments in relation to the plan and supporting studies. Whilst some of our previous comments have been addressed, a number of our comments still remain. We understand that all previous comments made to the first Regulation 19 consultation will be submitted to the Secretary of State for consideration, alongside comments made at this stage (second Regulation 19).

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56	1111	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		General	The Council is generally supportive of many elements of the plan, however, considers that a number of important matters have not been adequately addressed. In particular, the Council's main areas of concern include: - <ul style="list-style-type: none"> • Affordable housing • Health • Energy from Waste- air quality • Transport- road adoption & maintenance • Planning Obligations- S106/CIL
56	1112	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		General	The Council would like to attend the Local Plan Examination.
234	1295	Local Resident	Elaine	Gristock			General	As a resident in the railway cottages off Old Oak Lane NW10, I object to many points in the Local Plan. I fully support the extensive response forwarded by TITRA on behalf of local residents. To summarise my main objections:
236	1353	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		General	I write in response to OPDC plan. It is noted that there has been lack of cohesive and demonstrative consultations with the community most affected by this development.
236	1354	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		General	The need for OPDC to work with the community, RA's NF's is paramount. There is a great need for a protective buffer zone and green space around existing communities of low rise homes.
236	1360	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		General	There is a need for reappraisal and more community involvement.
100	1361	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		General	In March 2017 the interim forum submitted a designation application to OPDC and LB Hammersmith & Fulham for a 275 hectare neighbourhood area, covering all of the eastern part of the OPDC area and the surrounding residential communities in College Park and the Old Oak Estate. This designation application was determined by the OPDC Board on September 12th 2017. The Board chose to designate a much more limited 22 hectare area, as shown by the green boundary in the map below. Other parts of the area were deemed 'inappropriate' on various grounds including objections from landowners, differential characteristics, and the 'strategic' significance of certain sites. In response to what had been a cross-boundary designation application, LB Hammersmith & Fulham designated a separate neighbourhood area the Old Oak Estate, shown in the brown boundary below. No organisation has subsequently come forward to apply for designation as a neighbourhood forum to prepare a neighbourhood plan for this 'orphan' neighbourhood area. Following a further designation application for a forum to cover the limited 22 hectare area designated by OPDC, the Old Oak Neighbourhood Forum was finally designated by OPDC on 9th February 2018. See the map below for details of the neighbourhood boundaries approved by OPDC and LBHF. The Forum continues to believe that an opportunity has been missed to exploit the potential of the neighbourhood planning framework in creating a successful new part of London at Old Oak. The OPDC Draft Local Plan has changed significantly during the period in which it has been drafted. Major physical, financial, and phasing constraints on regeneration of the area have had to be taken on board by OPDC planners. The outcome, as presented in the 19.2 version, has fundamental problems. Our Forum tried very hard to persuade OPDC officers and the Corporation's Planning Committee, over many months of negotiations on our designation application, that approval to designation of the 275 hectare area we had proposed would bring benefits. Neighbourhood planning is not only the most localist layer of the English planning system. It is also potentially the most responsive to changed circumstances, involving processes and timescales which can bring new non-strategic planning policies into force over a shorter period than that required for revision of a Local Plan. It is also a process which ensures, through independent examination and a referendum, that policies are well evidenced and justified and command local support.
100	1362	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		General	We foresee a future scenario at Old Oak in which many factors related to infrastructure costs, land values, transport proposals, and the state of London's commercial and residential property markets. will conspire to require early reconsideration of several core OPDC policies in the 19.2 Draft Local Plan (including the detailed site allocations in the Plan and their consequential housing densities) . We believe that a large-scale neighbourhood plan, such as originally proposed, would have helped to provide a 'Plan B' for Old Oak that accommodated these changed circumstances, while also commanding greater local support than for the current OPDC version. But this way forward is no longer on the table. On the contrary, we consider that that as a planning authority the OPDC has gone out of its way to shut down prospects for effective community-led planning of new neighbourhoods at Old Oak by drawing up detailed 'Place' policies as set out within Chapter 4 of the 19.2. Draft which get into a level of detail inappropriate for a Local Plan document.
100	1368	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		General	The Old Oak Neighbourhood Forum wishes to be notified of the Examination in Public on the OPDC Regulation 19.2 Local Plan, and will wish to make oral representations.
82	1369	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	1.1 We are a neighbourhood forum in North Kensington, with 420 members. The neighbourhood plan for our area was successful at referendum in February 2016 and was 'made' by RB Kensington and Chelsea in July 2018 (see at https://www.rbkc.gov.uk/planning-and-building-control/neighbourhood-planning/current-projects/st-quintin-and-woodlands). The Plan's policies and site designations form part of the Development Plan for Kensington and Chelsea. 1.2 As a forum for an area bordering on the OPDC boundary, we have worked closely over the past 3 years with the Old Oak Neighbourhood Forum and with other local organisations in and around the OPDC area. Our chair Henry Peterson has acted as a volunteer adviser to the Old Oak NF, and is a MHCLG Neighbourhood Planning Champion. Our Forum responded to the previous consultations on the OAPF for Old Oak and Park Royal, to the OPDC Regulation 18 and 19 Draft Local Plans, and to the consultation on the new Draft London Plan.
82	1370	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	2.1 As we understand, it is unusual for a second version of a Regulation 19 Local Plan to be published for consultation. The changes made to the version issued by OPDC in June 2017 are substantial. The OPDC took 9 months to take account of comments made on their 2017 version, which followed a Regulation 18 version consulted on in early 2016 and an Opportunity Area Planning Framework published in 2015. It appears that a number of basic issues around the availability of land within the plan period, the requirements of HS2, Crossrail, Network Rail, and the topography of the area had been insufficiently considered at all these earlier stages.

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82	1373	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>2.4 Old Oak is London's last chance to create a world class example of sustainable and successful urban renewal. We believe that this opportunity is being largely squandered. The StQW Forum fully supports the development of a new part of London at Old Oak. But not in the way that the OPDC is currently intent on proceeding.</p> <p>2.5 As we and others have commented previously, no reasonable alternatives to the direction set by the OAPF and the Regulation 18 OPDC Draft Local Plan have been identified, explored or put before the public by the Development Corporation, since it took on responsibilities as a planning authority in April 2105. The LBHF Local Plan, prior to the removal of content on the area covered by OPDC, offered alternative futures for Old Oak which we argue should be revisited in light of events which have forced changes to OPDC thinking (see para 10.8 below).</p>
82	1379	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>2.6 The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: Incorrect identification of policies in the Place chapters of the Draft Plan as 'strategic' when these do not meet the relevant NPPG criteria. This inappropriately limits the scope of neighbourhood plans within the OPDC area, and is contrary to the NPPF.</p>
82	1407	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>8.1 Paragraph 184 of the NPPF states Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. The 19.2 OPDC attempts to meet this requirement by stating at paragraph 1.23 that Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies.</p> <p>8.2 This single sentence is inadequate, and in our view incorrect, in its attempt to identify those policies in the OPDC Draft Local Plan that should be deemed strategic. This was pointed out in previous responses to the 19.1 consultation, but the comment has been ignored.</p> <p>8.3 Clarity as to which policies in a Local Plan are 'strategic' is important to neighbourhood forums preparing a neighbourhood plan, in order that the 'general conformity' test is met. There are two designated neighbourhood areas/forums within the OPDC boundary (Harlesden NF and Old Oak NF). National Planning Policy Guidance deals with the identification of strategic policies as follows: What is meant by strategic policies? Paragraph 156 of the National Planning Policy Framework sets out the strategic matters about which local planning authorities are expected to include policies in their Local Plans. The basic condition addresses strategic polices no matter where they appear in the development plan. It does not presume that every policy in a Local Plan is strategic or that the only policies that are strategic are labelled as such. Paragraph: 075 Reference ID: 41-075-20140306 (Revision date: 06 03 2014) How is a strategic policy determined? Strategic policies will be different in each local planning authority area. When reaching a view on whether a policy is a strategic policy the following are useful considerations:</p> <ul style="list-style-type: none"> • whether the policy sets out an overarching direction or objective • whether the policy seeks to shape the broad characteristics of development • the scale at which the policy is intended to operate • whether the policy sets a framework for decisions on how competing priorities should be balanced • whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan • in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the Local Plan • whether the Local Plan identifies the policy as being strategic <p>Planning practice guidance on Local Plans provides further advice on strategic policies. Paragraph: 076 Reference ID: 41-076-20140306 (Revision date: 06 03 2014). How does a qualifying body know what is a strategic policy? A local planning authority should set out clearly its strategic policies in accordance with paragraph 184 of the National Planning Policy Framework and provide details of these to a qualifying body and to the inde-pendent examiner. Paragraph: 077 Reference ID: 41-077-20140306 (Revision date: 06 03 2014)</p>
82	1408	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>8.4 OPDC state that they view policies in chapters 3, 4 and 11 as 'strategic'. Chapter 4 covers the 12 'Places' in the OPDC area. Paragraph 4.2 states Policies in this chapter provide specific guidance for each place at a greater level of detail than the Strategic Policies in Chapter 3 and the Development Management policies later in the Local Plan. In light of the NPPG criteria set out above, which define how a strategic policy is determined, we think it self evident that the 'Place' policies set out in Chapter 4 are 'non-strategic'. They are not concerned with the 'broad characteristics of development'. They are at a very local or neighbourhood scale. They are not 'essential to achieving the wider vision and aspirations of the Local Plan'.</p> <p>8.5 There is a debate to be had on whether the site allocations included in the table at the end of Chapter 3 should in their entirety be deemed 'strategic' and as 'central to achieving the visions and aspirations of the Local Plan'. In practice this issue may not arise at examination of either a Harlesden or an Old Oak neighbourhood plan, given the limited neighbourhood area boundaries designated to date by OPDC. But in a Local Plan with a likely shelf life of 5 years or so after adoption (a period in which further neighbour-hood forums may surface) the 19.2 document needs a much more detailed and justified explanation of which Local Plan policies will need to be taken into account when the 'general conformity' test is applied.</p> <p>8.6 The new NPPF (which depending on timescales may or may not apply when the OPDC Local Plan is examined) covers these issues at paragraph 21 as follows: Plans should make explicit which policies are 'strategic policies'. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any local policies that may be needed. Those local policies may come forward either as part of a single local plan or as part of a subsequent local plan or neighbourhood plan. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other local policies (our emphasis).</p> <p>8.7 We consider it clear that Government intends that Local Plans, as the most local layer of the English planning system, should leave space for neighbourhood plans to come forward with 'non-strategic' policies.</p> <p>8.8 It is arguable whether all of the content of Chapter 4 of the 19.2 OPDC Local Plan, and its treatment of 12 'Places' within the OPDC area, is appropriate for inclusion within a Local Plan—particularly when further 'development principles' documents on e.g. Old Oak North and on Scrubs Lane are destined to be developed further and adopted as Supplementary Planning Documents.</p> <p>8.9 In any event, we consider the current wording of paragraph 1.23 of the current OPDC 19.2 Draft to be contrary to paragraph 184 of the NPPF and the sections of NPPG quoted above, and as such unsound.</p>

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82	1409	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>8.9 It is notable that apart from brief references recognising that any 'made' neighbourhood plans form part of the development plan for the area, very little mention is made of neighbourhood planning in the OPDC 19.2 Draft. Even in the more detailed Place chapters, there is no reference to the fact that the Old Oak Neighbourhood Area, designated by OPDC in September 2017, lies partly within Place P9 Channel Gate and partly within Place P8 Old Oak Lane and Old Oak Common Lane. No mention is made of the Harlesden Neighbourhood Area which extends into Place P11 Willesden Junction. None of the many maps in the 19.2 document, even in the Place chapters, show the boundaries of these two neighbourhood areas.</p> <p>8.10 These are statutory designations, of wider planning significance than e.g. conservation areas (which are shown on maps). Paragraph 155 of the NPPF states Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>8.11 Policy DI3 of the current OPDC 19.2 Draft Plan on Stakeholder Engagement and Being a Proactive Planning Authority includes a section on community participation at paragraphs 11.34-11.37. This refers to examples of activity in Tottenham Hale, of little relevance, while making no mention of the two neighbourhood forums designated by OPDC. How can local residents become aware of opportunities for participation and involvement at Old Oak, when the key planning document for the area chooses to ignore a layer of the planning system playing an increasingly significant role across England? These omissions of basic information need to be rectified prior to an Examination in Public.</p>
82	1410	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>9.1 The table overleaf summarises those matters on which we consider the 19.2 Draft Plan to fail to meet the statutory requirements, as defined below on the OPDC consultation web page. We have not repeated comments on parts of the Plan previously commented on, and which remain unchanged between the 19.1 and 19.2 versions.</p> <p>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.</p> <p>Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</p> <p>Effective: The plan should be deliverable over its period based on effective joint working on cross-boundary strategic priorities.</p> <p>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.</p>
82	1416	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>Incorrect identification of policies in the Place chapters of the Draft Plan as 'strategic' when these do not meet the relevant NPPG criteria. (Paragraph 8 above)</p> <p>The 19.2 OPDC Draft Plan states at paragraph 1.23 that Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies.</p> <p>The policies set out in these Place chapters do not meet the criteria for 'strategic' policies in NPPG 075 and 076. They are 'non-strategic' policies. This aspect of the 19.2 Draft Plan fails to accord with the requirements of NPPF Paragraph 184.</p>
82	1417	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>10.1 The Development Corporation took over planning powers from the three Boroughs on April 2015. The original timetable for preparation of a Local Plan, to replace the relevant sections of those Plans in use by the three Boroughs, was for Regulation 19 consultation to be concluded in summer 2016 (see OAPF paragraph 1.10). While there are understandable reasons for the extended timetable to date, the fact remains that the planning process has slipped by 2 years.</p>
82	1418	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>10.2 Were the Examination in Public to conclude that fundamental aspects of the 19.2 Draft Plan are unsound and need further work, there must be real questions as to whether this planning process is going to deliver its intended outcomes. Old Oak and Park Royal cannot be left without a planning framework under which decisions on applications can be made.</p>
82	1419	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>10.3 A possible way forward would be for OPDC to focus its energies and capacity on its development role. This would involve progressing the assembly of public land in the area, and preparing a series of masterplans (including the current masterplan for Old Oak North being prepared by the consortium led by AECOM).</p>
82	1420	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>10.4 The Corporation has the legal powers to delegate to the three Boroughs decisions on planning applications. It already does so for all minor applications. For reasons which have never been satisfactorily explained to the public, it also delegates back to LB Ealing all decisions on major applications at North Acton.</p> <p>10.5 In making decisions on major applications, LB Ealing appears to rely very largely on policies in its own 2012 Core Strategy and its 2013 publications on Development Sites and on Development Management, all of which documents form part of its Local Plan. While committee reports on applications acknowledge that major sites at North Acton lie within the OPDC boundary, no reference is made to the OPDC Local Plan or to specific policies within this. These do not appear to be taken into account as 'emerging policy'.</p> <p>10.6 If this approach to decisions on planning applications is good enough for North Acton, a location undergoing extensive regeneration, why should it not be good enough for Old Oak also? The LBHF Local Plan has recently been reviewed with a new version adopted in February 2018. Specific policy content on the OPDC area was not included in this version, albeit that the Core Strategy 2011 and Development Management Local Plan 2013 are documents which are more up to date than is the case for many Local Plans in daily use across England.</p>
82	1421	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	<p>10.7 At the time of the 2014 public consultation on the establishment of a Mayoral Development Corporation for the OPDC area, this Forum opposed the MDC option and favoured new joint working arrangements between the three Boroughs. Had this alternative route been pursued, we believe that LBHF Local Plan policies for the Old Oak part of the OPDC area would now be setting a different, more realistic, and more sustainable course for the future of the area.</p> <p>10.8 The LBHF Local Plan as drafted back in 2014/5 offered genuine alternative spatial strategies for what the Council defined as the Old Oak Regeneration Area. 6,000 new homes were proposed within the plan period, with a 'potential' total of 18,000. The Regulation 18 Draft offered the public alternative options in a way that the OPDC Local Plan process has failed to do. These included</p> <ul style="list-style-type: none"> • Defer the regeneration of parts of the site until suitable transport nodes are operational • Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area. <p>We consider these to have been sensible and appropriate options. Instead the Corporation has pursued a 'vision' for Old Oak which is proving increasingly unrealistic and out of sync with the legislative context and timetable for the HS2 and Elizabeth Line interchange.</p>

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82	1422	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	10.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority <ul style="list-style-type: none"> • conflicted between its 'development' mandate and its role in determining planning applications.
82	1425	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	10.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority <ul style="list-style-type: none"> • declining to make changes in response to consistent objections from local residents and community groups
82	1427	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	10.9 After the lifetime of the OPDC, it will be Hammersmith and Fulham that is left as the local authority dealing with the long-term consequences of the Corporation's Local Plan. The Borough Council and its electorate should be granted a far greater say in the planning policies and applications to be decided in the next 5 year period.
82	1428	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	10.10 In our view OPDC should delegate all applications to LBHF while the current 19.2 Local Plan undergoes major revision. Preferably LBHF should be allowed swiftly to prepare a set of development management policies within a 10 year 'meanwhile' Local Plan, covering the period until such time as the HS2/Elizabeth Line opens and outcomes are known on the provision of additional transport infrastructure in the area. 10.11 Such a 'meanwhile' Local Plan could provide a novel way of bringing forward development in the area which meets housing and other needs responsively and flexibly, including <ul style="list-style-type: none"> • identifying sites for self-build and custom-build housing with a 10-15 year lifespan to accommodate the construction workforce required to build the HS2/Elizabeth Line interchange as well as providing affordable homes for Londoners • taking a more flexible approach to protection of SIL within a broad buffer zone along the LBHF and Ealing boundary (including 'Old Park Royal) and allowing mixed use refurbishment and redevelopment of commercial premises. 10.12 A combination of the above and further policies would be more likely than the 19.2 Draft to build a sustainable and successful community at Old Oak, integrating existing and new populations. Development would be more evolutionary. Land values would remain lower than the levels resulting from OPDC support for 'transit-oriented high density' development. The pace at which buildings emerged on the ground might also prove faster than under the current planning regime, where build out rates will conform to market practices ⁴ , in an area where property values are static or falling.
82	1429	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		General	'When the facts change, I change my mind. What do you do Sir?' 11.1 This possibly apocryphal question by John Maynard Keynes is a relevant one, in relation to Old Oak. The 'facts' have changed a good deal since the OPDC embarked upon its Local Plan. But as a planning authority the OPDC has shown no willingness to consider any change of mind on the 24,000 housing target in the face of accumulating evidence that this number of dwellings simply cannot be accommodated in any reasonable or acceptable way, on the sites available for development. 11.2 The Examination in Public of the OPDC Local Plan is the last opportunity that local people have to make their voice heard. Debates at the OPDC Board and Planning Committee have shown little recognition of how the planning context has changed since 2015, or how upwardly revised 'development capacity' and density figures risk creating a part of London seen by future generations as an urban planning disaster.
110.b	1430	Community Group	Robin	Brown	Grand Union Alliance		General	The process of revision of the Regulation 19 plan has introduced numerous material changes to the plan which are buried in the detailed changes in wording as well as extensive new text. The process has required additional onerous engagement by stakeholders with numerous new documents to read. The Masterplans on which many of the changes are based have not been produced in collaboration with stakeholders and community members, they have not been consulted on, and there has been no sight for stakeholders of its evidence base or argumentation. Very substantial changes to the spatial plan have been made. No explanation has been offered for the changes in availability of land for development (e.g. Elizabeth Line depot) which significantly changes the potential for development in the plan period. There is a lack of certainty about the commercial development in this key area by the HS2 development. This will place additional and potentially intolerable burdens on the development and design of the areas remaining to fund needed infrastructure and to accommodate the decrease in value of developments on the remaining sites as a result of this uncertainty.
110.b	1431	Community Group	Robin	Brown	Grand Union Alliance		General	Our concerns therefore are that (a) This process of plan revision has been highly prejudicial to effective community engagement. The changes amount to considerably more than a "revision" of the Regulation 19 plan, and the format in which changes need to be identified by close inspection by the reader, and comments sought only on those changes, mean that it is very difficult to identify exactly what should have been commented on. This has made the consultation process itself unfair, unreasonable and ineffective. We strongly urge the OPDC to advise the Inspector to treat discussion at the IEP with significant latitude as key issues might not have been submitted in writing at this stage, but become apparent in due course.
110.b	1432	Community Group	Robin	Brown	Grand Union Alliance		General	(b) The amended site allocations in terms of quantum of development (Table 3.1) have not been justified. Evidence for these changes remains in the undisclosed master plan process. The consequences of the changes for the deliverability of the plan and the financial feasibility have not been addressed. There has been no amendment to the DIFS which already does not reflect the Mayor's estimates of infrastructure requirements. The loss of value of development for remaining sites, consequent of the uncertainty regarding the Elizabeth Line depot, further undermines the viability and feasibility of the plan as lower CIL and S106 demands will be realised for these sites without undue pressure being placed on the form of the development to deliver financial flows rather than good planning outcomes. In this regard, at its core, the plan is ineffective and cannot deliver on its policy ambitions because it is fundamentally compromised in its financial plan and infrastructure requirements.
110.b	1433	Community Group	Robin	Brown	Grand Union Alliance		General	c) We are concerned that changes to the plan proposed in this version represent efforts to undermine commitments to core sustainable and social infrastructure and the quality of the future OPDC area. We are highly concerned that within the plan there are contradictory policies and proposals which simultaneously proposed high standards conforming to national and GLA policy, but at the same time in other parts of the plan, forms of wording which leave open the possibility not to apply them. The Design chapter 5 holds a number of such examples of undermining positive policy commitments in the Places sections or other sections, such as Chapter 10 on community uses, Chapter 6 on Environment and Utilities and Chapter 4 on Places. The plan is internally contradictory, unsound, and will be ineffective in implementing its policy outcomes and ambitions.

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110.b	1434	Community Group	Robin	Brown	Grand Union Alliance		General	The current version of the draft Local Plan intensifies the concerns the GUA has expressed in consultation on the original Regulation 19 (1) draft Local Plan regarding the viability and effectiveness of the policy given the arbitrary targets for homes and jobs, and the lack of any viable financial plan for the infrastructure needed for the development. This places extreme pressure on CIL and S106 earnings and pushes for the approval of developments which do not conform with the stated policies in this plan. In this response we extend our concerns to the Park Royal intensification process, where this pressure is being further exacerbated by the new expectation that there should be no net loss of industrial floor space in the OPDC area.
110.b	1435	Community Group	Robin	Brown	Grand Union Alliance		General	The revised Reg 19 draft local plan is ineffective because its key policies cannot be implemented within the financial and capacity constraints; and it is not grounded on sound evidence as key inputs to the targets are unrealistic, created prior to any evidence being available. This approach and the policies are unsound as they will not be able to effectively implement the Plan's own policy ambitions for design and social infrastructure, Policy S2 on Good Growth nor the Mayor's draft new London Plan policies because: (a) the overall targets for homes and jobs have been arbitrarily set without testing at an earlier stage of plan formulation, introduced only through the London Plan (2014) appendix and not tested against the realities of OPDC area. It is this even more unrealistic to suggest that these should be treated as minima for development (Development Capacity Study 3.3); and (b) the use of ambivalent and subjective terms in the policies lead to poor outcomes in the context of the lack of funding for infrastructure which opens the gates to extreme pressure from both developers and planners on increasing the density and heights of specific developments, and reducing the quality of developments, making the overall deliverability of policy goals infeasible, and the policy unsound. We pointed these issues out in our response to the initial Regulation 19 draft, but note here that wording changes introduced to this draft exacerbate these concerns; these are also exacerbated within the context of the new Mayor's approach to height and density (which is as yet untested by the planning inspection process) and by some specific wording in key elements of the revised draft Regulation 19 text.
110.b	1550	Community Group	Robin	Brown	Grand Union Alliance		General	Introductory comment by the GUA From the University of Texas at Austin, an interdisciplinary group of postgraduate students undertook a study visit to Old Oak Park Royal in June 2018. They were led by: Simon Atkinson, Ph.D., RIBA, MRTPI, FRSA, Mike Hogg Centennial Professor, School of Architecture at The University of Texas at Austin; and by Robin Abrams, Ph.D., FAIA, ASLA, Professor of Architecture, College of Design, North Carolina State University, who leads a design practice based in Austin, TX, and London, UK . The group, having undertaken desk bound study prior to visiting, held two interactive workshops with representatives of the Grand Union Alliance to present their initial findings. Their brief was to progress plans and designs that expressed a locally-based approach whilst also responding to requirements of rail, environment, economy and sustainable growth potential. It was manifest from the workshops that the group struggled with fulfilling the demands of GLA imposed development targets for this area, whilst still creating plans for an assemblage of developments that actively promoted liveable places and neighbourhoods in which people could thrive. That the sheer scale of the housing quantum was not realistic nor practical, even though they had a depth of knowledge and appreciation of urban planning, landscape architecture, design and architecture from around the world. This was the overwhelming lesson taken from this exercise. The group, having returned to their university, will generate their reports and detailed findings in due course. It is hoped that the GUA may draw up on these when available to augment its case for a community-based alternative as set out in its vision and objectives response to the regulation 18 consultation. In the meantime, the following draft has been forwarded setting out some goals/ objectives and approaches that ought to form the basis for the planning of Old Oak and Park Royal. These have yet to be reviewed and accepted by the GUA for such statements need to be scrutinised and discussed in an open forum of members first. No doubt some adjustments may well be required. As with the GUA's Vision and Objectives statement, the resulting plans for the built and natural environments would better fulfil the statutory purpose of planning, to produce sustainable development, than those of the OPDC. Whilst the OPDC may contend that the content of the proposed community-based vision and objectives have been embedded within the spatial vision, narratives and policies of the OPDC's draft Local plan regulation 19 consultation (see Statement of Consultation June 2018), virtually all the subtlety and nuances by the GUA have been lost.
110.b	1552	Community Group	Robin	Brown	Grand Union Alliance		General	Planning requires what might be termed a "top down" approach to address major issues facing the growth and resilience of the city. However, local planning is equally important in understanding the detailed issues facing a community, and in considering the means to obtain the most appropriate new development which complements and enhances with the opportunities of new town and urban village environments, accessibility, jobs, affordable homes, and improved amenity. Sadly, all too often these ambitions have been lost in the new developments of London, taking on what might be referred to as an international and high income billboard attraction, and not one that captures the "spirit" of London.
110.b	1553	Community Group	Robin	Brown	Grand Union Alliance		General	Local communities have met extensively, and held participatory workshops throughout the early stages of planning for Old Oak Common and Park Royal. Serious issues need to be recognized in their neighbourhoods, - crime, under-education, lack of schools and amenities, air pollution, heavy traffic impact, difficult terrain, many barriers with closed off areas and lack of access, in fact a series of isolated and unwelcoming islands, many nonproductive and privatized land uses breaking up the area. These must be addressed as a starting point. In respecting the significant work that has gone into these initial planning stages, it is now clear, and agreed upon by the local communities, that the current approach of the Mayor's team cannot, and will not work. It sets unrealistic and non-achievable goals and, as currently geared, will lead to an isolated station complex, later to be flanked by an expensive "international" commercial centre of tower blocks, while Park Royal remains a restricted industrial zone lacking the impetus to evolve as a 21st century work environment. At the same time, large tracks of land are not addressed or developed until much later in the project, while the potential of adjacent neighbourhoods, and of the Grand Union Canal has not been fully realized.
110.b	1554	Community Group	Robin	Brown	Grand Union Alliance		General	In reviewing the draft plan, we suggest sixteen goals and approaches that we consider necessary
110.b	1555	Community Group	Robin	Brown	Grand Union Alliance		General	A full set of surveys and inventory be made across Park Royal and Old Oak Common, and abutting neighbourhoods, to determine existing conditions in terms of housing, jobs, health, environment, and amenity. This should act as an underpinning to the development plan, where key goals should be to "improve the opportunities, amenities, and health of the entire area, and of its inhabitants".

Chapter 1. Introduction

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Para/Figure Reference	Comment
47	574	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea			The Council shares the OPDC's vision for the area as one which can provide much needed jobs and homes in the area that can support London's growth. The Council welcomes the creation of a real sense of place, and a "series of high quality neighbourhoods and spaces" (Foreword).
47	575	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea			The Council welcomes working with the OPDC to improve the connections between the OPDC area and the adjoining Kensal Canalside Opportunity Area. However, the OPDC should be more explicit in supporting these links and in recognising the role that a Crossrail station at Kensal Canalside would have in achieving both the Mayor's and the Council's ambitions for this area. This was raised in our initial response, but does not appear to have been fully addressed.
47	576	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea			In particular, we note that there are no plans for the North Pole depot (west) site to come forward during the lifetime of the Plan and this is concerning. We are now in active discussion with the Department for Transport (DfT) with regard to the land at North Pole depot (east) coming forward for development and over the coming months we will be looking to masterplan this site with a supplementary planning document and masterplan adopted by the beginning of 2020. On site development is likely within the next 5 years. The best way to do this is clearly to include the depot land over the boundary so that the two sites benefit from the synergies of one masterplan. Whilst we will invite OPDC officers to be part of this exercise because of the lack of status in the OPDC Plan it will not be possible to produce supplementary planning guidance for this land. Any planning exercise on the OPDC land can therefore only be illustrative. We would therefore urge OPDC to bring this land forward as part of an early review of the Plan once it is adopted.
99	618	Residents Association	John	Haston	West Twyford Residents Association		Chairman's Foreword	1. – second last paragraph refers to "new evidence" as part of the reason for this latest revision - without stating what new evidence. Is it the lack of access to Elizabeth Line's new siding, or the fact that the two new London Overground stations have not yet been agreed with Network Rail?
99	619	Residents Association	John	Haston	West Twyford Residents Association		Chairman's Foreword	General – no mention is made of the 'Master Plan's' progress or its delivery date and no mention is made where OPDC are relative to the overall project programme's timescale?
99	620	Residents Association	John	Haston	West Twyford Residents Association		1.13a	2. Para 1.13a – 'transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange.'" A nice statement but I would suggest this is untenable re roads, as the scope of OPDC's area does not include the major road connection points / interchanges with the A40 Western Avenue, and the A406 North Circular, or access to Harlesden or Willesden. They are existing roads, but heavily congested - without the increase in traffic expected in OPDC's redevelopment. (A lot of the existing 'entry' roads currently do not have room for separate public transport systems.)
99	621	Residents Association	John	Haston	West Twyford Residents Association		1.24 and 1.25	3. Relationship with High Speed Rail Para 1.24 and 1.25 – no reference or amended text is made of the availability of the Elizabeth Line Depot and how an effective interface with the HS2 and Elizabeth Line stations can be made without access to this area?
28	703	Strategic Partner	Lucinda	Turner	Transport for London		1.22 / 1.23	TfL considers that the OPDC Place policies and Delivery and Implementation policies cover strategic matters, including existing and proposed transport infrastructure of both London-wide and national importance. TfL therefore welcomes that chapters 3, 4 and 11 will all form part of the OPDC's strategic policies for the area.

Chapter2. Spatial Vision

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	35	Planning Consultant	Ashley	Collins	JLL	Imperial College	Spatial Vision	Fig 2.1	Within Figure 2.1 under the heading of 'Economic Growth', the drafting refers to the area having capacity to deliver 7,600 new jobs over the next 20 years. This is incorrect and the number should be amended to reflect the correct figure of 40,400 that is referred to in paragraph 3.3 and elsewhere within the draft.
90	237	Local Resident	John	Cox			Spatial Vision	2.4	<p>Add at the end: "The OPDC recognises that some residents and business feel the area has been neglected historically partially because of the somewhat arbitrary division into separate local authorities since Victorian times. That neglect has been made worse by general lack of interest by the local press, which always had circulation areas dividing along those very same boundaries. The OPDC seeks to unify strategic planning and the benefits that accrue from that, while fully recognising the roles and individual priorities of the constituent London boroughs".</p> <p>Reason: It is appropriate that the Local Plan reflects reality, and the continual comments it has received over the last three years from local communities. As evidence, and justification for the inclusion of the above wording, you could have chosen to document that view in a supporting document.</p> <p>That analysis applied even in the mid-2000s, when we tried to stop a waste incinerator on the industrial land reached from Channel Gate Road, off Old Oak Lane. It was in LB of Ealing, but one or two hundred metres from Brent and Hammersmith & Fulham. It was only due to very difficult cross-boundary campaigning that we succeeded.</p> <p>About three years ago I contributed to an article in 'The Economist' (name-dropping) on that very subject: 21 Feb 2015, page 31: "London Property: Building on the boundaries: There is a pattern to London's big developments".</p> <p>It goes on: "London's 33 boroughs are collectively much more powerful than the city's mayor. To a large extent, they determine what is built within their borders. They are also short-sighted, frequently neglecting their edges in favour of their middles, where most people live. Look at the borough map in any London town hall, says Michael Hebbert, a professor at University College London, and it 'could be an island, surrounded by beaches'. The peripheries are for waste-tips and warehouses, the centre for libraries and office blocks."</p> <p>Below the article The Economist used a GLA aspirational image of Old Oak Common, which it called the "Canary Wharf of the North" [North?].</p> <p>The article also quoted Nine Elms, City Fringe (where?), Finsbury Park, Blackfriars and Kings Cross. I also suggested car-based Brent Cross Cricklewood (now thankfully paused/abandoned).</p> <p>For soundness, the suggested additional 2.4 wording above is amply justified and an essential part of the positive preparedness of your Local Plan.</p>
17.b	267	Strategic Partner	Debbie	Fifer	Canal & River Trust		Spatial Vision	Figure 2.1	Fig 2.1 Grand Union Canal & Wormwood Scrubs. Whilst it is recognised that the canal currently provides a valuable green and blue link, it is proposed to delete reference to enhancing the canal as a green and blue link, referring only the green element. We consider that deletion of reference to enhancing the "blue" element is unnecessary and could be open to misinterpretation in terms of targeting enhancement opportunities, to the detriment of the canal.
47	577	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		Spatial Vision		The Council welcomes the amendment to the Going Local Objective 13, which specifically adds a reference to "existing and new communities." This addresses the importance of integrating the planned communities of Old Oak and the Kensal Canalside OA in general terms, if not providing a specific reference to Kensal. We remain concerned that the strategic policies within the plan fail to seek to deliver the proposed east-west connection between the OPDC area and Kensal over the Plan Period. The delivery of these connections within the OPDC area are essential to the realisation of K&C's vision of the Kensal OA, which seeks connects with Old Oak Common (see Local Plan Partial Review, CV5, p.50). To this end, the Council supports the amendment to the Key Diagram at Figure 2.2 and subsequent maps / diagrams throughout the Plan, which indicate the east-west link between the OPDC area and Kensal OA as a 'key route'.
28	704	Strategic Partner	Lucinda	Turner	Transport for London		Spatial Vision	Figure 2.1	Transit Oriented Development – The reference to new Hythe Road and Old Oak Common Stations is potentially misleading as these stations are not yet committed or funded. We are working with OPDC and other stakeholders to secure funding for them. They should be referred to as 'potential' new stations throughout the document.
28	705	Strategic Partner	Lucinda	Turner	Transport for London		Spatial Vision	Figure 2.1	The additional mention of the Mayor's mode shift targets and traffic reduction strategies is welcomed.
28	706	Strategic Partner	Lucinda	Turner	Transport for London		Spatial Vision	Figure 2.1	Health and Wellbeing – TfL welcomes the added reference to the Healthy Streets approach.
28	707	Strategic Partner	Lucinda	Turner	Transport for London		Spatial Vision	Figure 2.1	Deliverability – TfL notes that elsewhere in the document references to the Elizabeth Line depot site being delivered as part of the current Local Plan have been removed as previously requested.
28	708	Strategic Partner	Lucinda	Turner	Transport for London		Spatial Vision	Figure 2.2	TfL requests that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period. This comment is also relevant to a number of other figures in the document e.g. Figure 3.7, 3.15, 10.3
28	711	Strategic Partner	Lucinda	Turner	Transport for London		Spatial Vision	Figure 2.2	TfL requests that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period. This comment is also relevant to a number of other figures in the document e.g. Figure 3.7, 3.15, 10.3
119	830	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Spatial Vision	5	<p>Vision adjectives such as shaping, driving and new do not include value or protection unlike the foreword or key aims.</p> <p>Could 'protection' also be added to the Vision?</p>
119	831	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Spatial Vision	5	<p>The Scrubs is more than just MOL and its unclear what the Local Plan means by Metropolitan Park.</p> <p>It is the size and range of potential uses of the Scrubs that has Metropolitan value and this role must protect all habitats and uses of value.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
119	832	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Spatial Vision	5	Clearly the scrubs have Metropolitan value: <ul style="list-style-type: none"> • Although the Scrubs is not identified as a Metropolitan Park in the London Plan it is in the All London Green Grid. • The Scrubs Act of 1879 states that it is for the use of 'the inhabitants of the Metropolis for exercise and recreation' • The HS2 project aims to improve Biodiversity with ambition to upgrade the Site of Interest for Nature Conservation (SINC) from Bor. Grade 1 to Metropolitan value. <p>Addition/change to Thinking Big (5) Wormwood scrubs will be accessible MOL, protecting valuable spaces and habitats to that will continue to perform its role as a metropolitan park'.</p>
119	835	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Spatial Vision	9	Natural heritage should be recognised. Chapter 5 D8 is almost exclusively concerned with buildings but Historic England and Natural England's concerns include the protection of parks and natural landscape heritage of which the Scrubs has a range that. need to be understood, protected and enjoyed. Change to Going Local (9) The areas' existing rich; social, cultural, and built, environmental and natural heritage assets such as... Suggest omitting 'and' to clarify that heritage assets can be environmental and adding natural as well as built and cultural.
35.b	1023	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	Spatial Vision		We support the overall spatial vision. However, we encourage the OPDC to continue working proactively with all interested parties to drive forward the regeneration and to ensure that available development opportunities are acknowledged and their potential realised at the earliest opportunity.
35.b	1024	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	Spatial Vision	2.1	Figure 2.1: Opportunities and Challenges We would make a number of comments and suggested amendments to Figure 2.1. Transport Orientated Development – This rightly acknowledges the importance of making improvements to Willesden Junction Station; however, this should go further to note that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will bring about both significant improvements in the PTAL rating of the regeneration area to the North of the Canal, in a manner that can be readily delivered, and also facilitate the early delivery of a significant number of new homes and jobs in this location, particularly on the EMR site itself.
35.b	1025	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	Spatial Vision	2.1	Place Making – The EMR site offers an opportunity to deliver early development in a manner that can both be integrated into longer term development proposals and also actively assist wider development through the early facilitation of important infrastructure, in particular the new link to Willesden Junction Station.
35.b	1026	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	Spatial Vision	2.1	Grand Union Canal and Wormwood Scrubs – We support the reference to enhancing access to Wormwood Scrubs so that it can be enjoyed by more Londoners.
35.b	1027	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	Spatial Vision	2.1	Deliverability – It is right that this section acknowledges the challenges for timely delivery; however, either here, or in the Opportunities section, it should be noted that early delivery of new housing and commercial space is being achieved at Oaklands, and there are other opportunities including at Oaklands North, along Scrubs Lane and at EMR (as referred to above) where additional early development could be achieved.
110.b	1447	Community Group	Robin	Brown	Grand Union Alliance		Spatial Vision		SP9 proposed outcomes, paras 3.79, 3.80, fig.3.15: In light of the proposed amendments to the Regulation 19 plan, we would like to see a strengthening of the policy requirements relevant to tall buildings. The current Policy SP9 concentrates on relation to existing and surrounding sensitive contexts. These are good aspirations, but they are not secure in implementation, as we see in fig. 3.15, where tall buildings are mandated in the sensitive edges, following planning application negotiations and determinations. We are deeply concerned that the ineffective and unviable nature of this plan will lead to more poor outcomes against the stated proposed outcomes of the plan. The wording here needs to be strengthened in this regard. Current actual outcomes have seen tightly worded planning determinations, pressed to their limit by developers. For example, in seeking to prove "less than substantial harm" to heritage assets, which has seen strong objection from English Heritage (this concerns the North Kensington Gate development). The current wording is ambivalent and should be changed to be clear that no harm should be inflicted on heritage and local assets and sensitive locations which have been identified for protection, otherwise this policy is more than unsound and ineffective, it is completely useless.

Strategic Policies

Policy SP1: Catalyst for Growth

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	36	Planning Consultant	Ashley	Collins	JLL	Imperial College	SP1	Para 3.4	Imperial College London supports strongly the reference to providing a range of land uses that promote and support London's role as a global city and its position as the world's economic capital. The recognition in paragraph 3.4 to the transformation taking place in the White City Opportunity Area is particularly welcomed and Imperial College London agrees that there will be economic synergies with the Old Oak area and agrees to explore these with the OPDC.
47	578	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		SP1	3.4	The amendments to SP1 para 3.4 bullet point 1 and SP7 para 4.47 are welcomed as these recognise the potential for a new station at Kensal Canalside. SP1 para 3.4 bullet point 6 - the deletion of "mitigate" and insertion of an approach to development that seeks to ensure there is no detrimental impact to vitality and viability is welcomed. This overall approach should also be incorporated into Chapter 4 to fulfil the Duty to Cooperate and ensure consistency with national policy.
47	582	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		SP1		Support amendment to note that the creation of new centres will not have an adverse impact on the vitality and viability of surrounding centres. This reflect the wording of the NPPF.
28	714	Strategic Partner	Lucinda	Turner	Transport for London		SP1	Para 3.4	Kensal Canalside – TfL's concern is that a potential Elizabeth Line station or one on the main line in this location would be extremely challenging to bring forward, both technically and in terms of value for money. Therefore other non-rail interventions may be more suitable for bringing forward development. The revised wording in the Plan reflects these uncertainties and the clarification of the project's current status is welcomed.
35.b	1028	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	SP1		The new Old Oak Common Station will be a catalyst for growth; however, this is some years off delivery. In the interim, there will be other developments that can have a catalytic effect, including the delivery of a new bridge connection to Willesden Junction Station to capitalise on what is already a very well connected transport interchange. As noted, this would open up the regeneration area to the north of the Grand Union Canal, greatly improve the PTAL rating of the area and allow significant early new development of housing and commercial space. This potential for early catalysts for growth should be acknowledged further in the Policy and the supporting text.
110.b	1551	Community Group	Robin	Brown	Grand Union Alliance		SP1		We fully support the Mayor in steering London to be a world leader in industry, economy, communication, environment, and high quality of life for all of its people. In this regard, Old Oak Common and Park Royal represent a unique opportunity to create a new London, one of the 21st century. In understanding the need for major rail "hubs", significant job growth, and provision of a large number of homes, our workshops have concentrated on the "sense of fit" of these ambitions to the context of our disjointed and deprived neighbourhoods and environment.
120	1621	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		SP1		While the principal intended outcome of this policy is to develop a transport hub that supports the creation of a new part of London that in turn, acts as a catalyst for growth at local, regional and national levels, part (c) of the policy specifically refers to a contribution to meeting local needs and complementing surrounding centres. We believe that some of the textual amendments indicate a dilution of this policy. A movement from promote to support

Policy SP2: Good Growth

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
90	235	Local Resident	John	Cox			SP2	3.8	Add at the end: "As examples of sustainable good growth, increased economic activity is particularly appropriate near the rail and tube stations which surround Park Royal. Attempts will be made to urbanise the immediate vicinity of the stations, in co-operation with neighbouring planning authorities."
28	715	Strategic Partner	Lucinda	Turner	Transport for London		SP2		Transport is a key consideration of Good Growth. Transport principles of Good Growth are set out in the MTS (Chapter 5). A reference to transport principles of Good Growth should be included in the policy and the supporting text with cross-references to the transport chapter.
56	1117	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		SP2		Consider adding a new strategic policy on the issue of climate change adaptation.
43	1321	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	SP2		We write on behalf of our client, A40 Data Centre B.V an entity of PPHE Hotels Group to submit representations to the Old Oak and Park Royal Second Regulation 19 revised Draft Local Plan and its supporting evidence base. PPHE Hotels owns, leases, develops, manages and franchises primarily full service four-star deluxe and contemporary lifestyle hotels in major gateway cities and regional centres primarily in Europe. It is a leading hotel operator who operates 39 hotels across the world, 8 of which are in and around Greater London including the very successful Park Plaza operating at 628 Western Avenue adjacent to Park Royal underground station (to the south west) and situated to the north of Western Avenue (A40), between the Hanger Lane junction and the Concord (North Circular) junction. This Park Plaza is one of their most successful hotels, employing circa 60 people, attracting both commercial and visitor/leisure business related to both Wembley and wider Park Royal Estate. The development of Park Plaza has helped to secure a considerable economic and environmental gains, opening up links to areas beyond the nearby underground. They have an outstanding requirement for additional bed spaces as well as the need to secure their own B2 laundry to service all their hotels in the Greater London leading to considerable operational efficiencies. as well as enabling them to maintain the highest standards. The intention is to submit a planning application for a mixed-use development comprising industrial, office and hotel where the SIL floorspace is optimised and complementary employment uses are provided above. We welcome the opportunity to make representations on the second revision to the Regulation 19 Draft Local Plan (June 2018). These representations are made in addition to the representations made on the first Draft Local Plan in 2017. All the comments and observations made in the letter dated 17 September 2017 still apply. This letter outlines a number of the key comments and observations which we would like to record mainly relating to the Park Royal Area where our Client's site is located.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
43	1322	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	SP2		We continue to be supportive of the principles set out in Policy SP2 (Good Growth) and SP9 (Built Environment). The revised policies include an additional paragraph that refers to OPDCs proposed outcomes. Specifically, the text states that the OPDC will be "delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability."
43	1323	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	SP2		We agree that new high density development should be provided within the OPDC and sites intensified where possible, particularly those that have the potential to increase employment over and above what exists there now. The OPDC should encourage innovative developments which optimise and realise the benefits of regeneration and growth, including those that are subject to designations and are located in areas of high public transport accessibility.
236	1356	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		SP2		The amount of pollution created by such a vast development in an area that suffers from high pollution levels will need to be closely monitored
110.b	1556	Community Group	Robin	Brown	Grand Union Alliance		SP2		The driving force to everything is undoubtedly the complex of new stations. Rail stations, unlike airports, do not require parking, which takes land away from home provision. The station environment should not be one of car parks or overwhelmed by taxis, but form a walking and local transit convenience with close proximity to homes and jobs.
110.b	1557	Community Group	Robin	Brown	Grand Union Alliance		SP2		The stations should be places of delight, with universal accessibility, natural light, and act as a billboard to local enterprises. The more the stations can be designed as joint use, possibly incorporating a local market, have show areas for local industry, and opportunity for technical training, the better.
237	1587	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP2		The need for a commitment to public services and the existing community needs while the development takes place, e.g. retaining and even enhancing existing public transport to allow for workers coming into the area over next 10-20 years; maintaining and improving the roads; tackling air pollution; looking at building sound barriers; keeping the area clean and free from litter & fly tipping; planting trees to help control the pollution from HGVs and dust; controlling the increasing HMOs/slum landlords; community facilities and meeting places, etc.

Policy SP3: Improving Health and Reducing Health Inequalities

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
17.b	268	Strategic Partner	Debbie	Fifer	Canal & River Trust		SP3	Para 3.17	<p>Para 3.17. There is a change in reference from a "walkable and cyclable city" to delivering "Healthy Streets". Whilst the Trust would prefer reference to a "walkable and cyclable city" we recognise that the change reflects the aspirations that sit behind the Mayor's Healthy Streets initiative and generally agree that improving the quality of place and the experience of users is vital to increase active travel, improve air quality, reconnect communities and reduce health inequalities, as the Mayor's vision recognises.</p> <p>We do however have concerns that the term "healthy streets" could be interpreted to a narrow definition of "streets", failing to recognise the important role that green and blue corridors or open spaces can play in providing attractive walking and cycling routes. Canal and riverside paths in the Trust's care have significant potential to help deliver the Mayor's vision to increase levels of walking and cycling, particularly for shorter journeys or as part of a longer journey.</p> <p>The Trust would therefore wish to see additional text added to clarify that the term encompasses green and blue infrastructure, off road routes etc which all contribute to providing sustainable active travel routes. Such a definition could also be usefully provided within the local plan glossary.</p>
28	716	Strategic Partner	Lucinda	Turner	Transport for London		SP3	Para 3.17	The reference to the Healthy Streets approach and mode shift in the supporting text is welcomed although the importance of encouraging active and sustainable travel should be included as a core part of this policy.
231	1088	Local Resident	Eric	Leach			SP3		Two of the closest NHS District General Hospitals - Charing Cross and Ealing Hospitals – are planned for closure (NHS North West London's 2012 'Shaping a Healthier Future' plan and NHS NWL 's 2016 'Sustainability & Transformation Plan'). There is no indication how these hospital downgrades (including loss of A&E, Intensive Care and overnight Emergency beds) will be mitigated by OPDC plans for its new 60,000 residents and 55,000 workers.
236	1359	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		SP3		There is the need for existing communities to have the commitment that their health and welfare and public services will be protected, monitored and if necessary enhanced during all the period of development.
110.b	1436	Community Group	Robin	Brown	Grand Union Alliance		SP3		We also note that the added requirement for intensification of Park Royal to replace net industrial floor space lost in Old Oak extend these issues to that area, with special concern for the feasibility and quality of developments which will be brought forward in Park Royal Centre, and in the Bashley Road site adjacent to the Ealing Gypsy and Traveller Site. We are deeply concerned to protect the quality of this residential area as surrounding sites are proposed for intense industrial development, to address arbitrary and unjustified targets set at the scale of the London Plan and the OPDC Revised Regulation 19 Local Plan. The relevance of Policy SP3 in this regard should be at the forefront of any redevelopment plans for this site. We discuss this below.
110.b	1562	Community Group	Robin	Brown	Grand Union Alliance		SP3		It is possible for two adjacent "new city centres" to be formed in the core area, one more associated with the new stations, the other forming a link with Willesden Junction and Harlesden to the north. A new range of jobs, amenities, homes, shops, and street environments can be brought to the area. All buildings should be scaled in relationship to the qualities of pedestrian streets, - dense, but also able to capture the beneficial effects of sun and with small pocket parks. Historically, this sense of mixed, complex city street can be found in St James, Marylebone, Bermondsey, and Bloomsbury.
110.b	1567	Community Group	Robin	Brown	Grand Union Alliance		SP3		With London hospitals at a breaking point, the 21st century must become a century of good health. Old Oak Common and Park Royal plans should emphasize health as a lead quality by offering clean air, have few polluting vehicles, and a healthy walking environment. This should be complemented by local food production. This could be one of the new industries of Park Royal and a range of local opportunities should be presented for local food production, and where it can be sold locally.

Policy SP4: Thriving Communities

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
201	4	Local Resident	Maria	Lonergan			SP4		Please do not build any more flats. No one is buying them. Have several opposite me and next door that are empty a long time. I see on the W3news website that there are currently too many and no one is buying. There are insufficient parking available, A&E's locally are shut down. Policing the area has dropped. Phoned police recently about anti social behaviour, none available at all. The sewage pipes in the area cannot cope with the extra loads from the new flats. Streets shut down due to this a lot. Please provide more leisure facilities for the locals. Heard The Castle Pub is being turned into flats, The Goldsmith Arms was shut down recently. There are no provisions for teenagers locally. This is what needs focusing on, not more homes. I cannot make your presentation events as on duty those dates and times. Please no more flats.
42	189	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	SP4		We continue to note that the overarching target to provide 50% affordable housing is very ambitious, but we welcome the recognition in 3.21 that developing land in the OPDC area is complex – in particular given the level of infrastructure needed to support any development. We also welcome the clarification elsewhere in the document that major development schemes such as OOP are required to provide significant new infrastructure, and that this requirement will need to be balanced against affordable housing and other matters. We will continue to work with the OPDC and other stakeholders to identify and maximise the potential benefits to promoting lifetime neighbourhoods, social cohesion and community integration within a viable development scheme.
115	293	Local Resident	Nye	Jones			SP4		Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
210	303	Local Resident	Gail	Dobinson			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
211	312	Local Resident	Catherine	Goodall			SP4		I have reviewed your plans for the Local area and want to object. Specifically, I object to Policy SP4 as building this many new homes - 22,350 over the next 20 years is over-development and too high housing density which will overload local infrastructure such as transport, schools and doctors.
213	321	Local Resident	Rachel	Ritfeld			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
213	331	Local Resident	Rachel	Ritfeld			SP4		We are dismayed that the draft Local Plan is targeting at least 22,350 additional homes between 2018-38 (building on the existing London Plan's target of 25,500 homes and 65,000 jobs in Old Oak). Neither the current draft Local Plan document nor the existing London Plan has ever offered credible research or transparent calculations showing how this huge target can be achieved. Our concern is heightened by academic studies which question these targets. In 2017, a review of the previous Local Plan by the Universities of Cambridge and Berkeley concluded that 18,000 homes was a realistic target and stated that current plans would create excessive density. The report's executive summary recommended: "a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance. As a result, the proposed development could be scaled to more closely match that of the surrounding neighborhoods." TITRA restates its concern that the OPDC will not reach its Local Plan housing target without relying too heavily on excessive housing density and high rise development that is out of kilter with existing neighbourhoods, as seen at North Acton and in the wholly out-of-scale new Oaklands development on Old Oak Common Lane. This high-density development is likely to result in unsustainable communities, place strain on existing social and transport infrastructure and harm existing communities. TITRA thinks Local Plan policy SP4 is unsound.
214	345	Local Resident	Ciara	Solmi			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
32	383	Local Resident	Bernie	Timmins			SP4		I object to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
113	395	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP4		3 Headline concerns for Wells House Road Residents Association & its members 3.1 We object to the number of homes indicated in the Local Plan: 25,500 new homes and 55,000 jobs. These figures were set by the former mayor, Boris Johnson, before it was confirmed that large swathes of the OPDC space would be taken up by the Crossrail Depot and sidings. The figure has become somewhat of an unrealistic obsession and should be revised in line with the decrease in space. These figures have been challenged by experts including the University of Texas, and Cambridge and Berkeley Universities whose report (https://www.martincentre.arct.cam.ac.uk/seminars/joint-cambridge-berkeley-urban-design-charratte-2017/old-oak-common/view) concluded: "The target of 24,000 dwellings together with the 15 million sq ft of commercial space needed for 55,000 jobs will result in net residential densities higher than anything ever built in London. The team measured the gross site area and then calculated the net residential area after excluding land for the transit-hub and land for commercial space, open space and other uses. The net result was that an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London (our emphasis). The proposed densities would result in every block having a high-rise tower. The team demonstrated the implications of such high densities in terms of sunlight access on streets and blocks as well as the impact on the surrounding neighborhoods. They recommended a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance."
113	398	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP4		3.3 We are also concerned at the cart-pulling-the-horse approach for the master plan development, i.e. why Aecom hasn't been employed to guide the housing and business figures rather than being required to fit their designs with pre-existing and unrealistic numbers.
113	409	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP4		There is also widespread concern about lack of commitment to building truly affordable family homes. Instead, local residents are deeply concerned that the OPDC seems committed to extending North Acton with plans for housing for transient renters and students as exemplified by the approval of the poorly designed Oaklands. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
113	410	Local Resident	Thomas	Dyton	WHHRA (Member)		SP4		There are also concerns that that affordable housing isn't really affordable to people who most need it, e.g. nurses, police, teachers, social workers, the elderly, first-time buyers, families with lower incomes, etc.
113	417	Local Resident	Thomas	Dyton	WHHRA (Member)		SP4		Overall, we do not wish Old Oak Common and Park Royal to become an extension of unpopular North Acton or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, poor design, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study); and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally. Student housing should not be used to fulfil necessary housing targets.
113	423	Local Resident	Thomas	Dyton	WHHRA (Member)		SP4		This all demonstrates a long-term need for a commitment to public services and support for the existing communities while the development takes place, e.g. retaining and even enhancing existing public transport (to allow for workers coming into the area over next 10-20 years); maintaining and improving the roads; tackling air pollution; looking at building sound barriers; keeping the area clean and free from litter and fly tipping; planting trees to help control the pollution from HGVs and dust; controlling the increasing HMOs/slum landlords; supporting the community through the years of dealing with the unresponsive HS2.
92.b	428	Community Group	Melanie	Whitlock	The Hammersmith Society		SP4		6 We do not consider the draft Plan is positively planned or justified in respect of housing targets, densities and heights. There is still no supporting evidence in the Draft Plan for the target of 24,000 new homes. The comments from the Old Oak Neighbourhood Forum set out in detail how the total figure is unfounded but endlessly repeated, with OPDC working backwards from that figure to define development capacity for each site, with no appropriate site by site planning brief.
219	442	Local Resident	Jane	Dreaper			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future. This goes far beyond previous figures and I would like to see the detailed rationale. Where are the plans for infrastructure such as GP surgeries which will support such massive growth? All plans put forward so far involve 100% apartments and no actual houses - there is no sense of encouraging a blended community.
220	451	Local Resident	M.	Szoke			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
221	460	Local Resident	James	Trew			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
221	470	Local Resident	James	Trew			SP4		We are dismayed that the draft Local Plan is targeting at least 22,350 additional homes between 2018-38 (building on the existing London Plan's target of 25,500 homes and 65,000 jobs in Old Oak). Neither the current draft Local Plan document nor the existing London Plan has ever offered credible research or transparent calculations showing how this huge target can be achieved. Our concern is heightened by academic studies which question these targets. In 2017, a review of the previous Local Plan by the Universities of Cambridge and Berkeley concluded that 18,000 homes was a realistic target and stated that current plans would create excessive density. The report's executive summary recommended: "a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance. As a result, the proposed development could be scaled to more closely match that of the surrounding neighborhoods." TITRA restates its concern that the OPDC will not reach its Local Plan housing target without relying too heavily on excessive housing density and high rise development that is out of kilter with existing neighbourhoods, as seen at North Acton and in the wholly out-of-scale new Oaklands development on Old Oak Common Lane. This high-density development is likely to result in unsustainable communities, place strain on existing social and transport infrastructure and harm existing communities. TITRA thinks Local Plan policy SP4 is unsound.
222	485	Local Resident	Stephanie	Hewett			SP4		Proposed 22,300 new homes - whilst new housing is desperately needed the area does not have the infrastructure to support this many new residents - roads are already jammed, especially access onto the A40, schools are heavily over subscribed as are NHS services, parking is also a serious concern. There doesn't seem to be any recognition of the huge impact this number of new homes will have on existing residents who depend on these facilities. The sheer scale of these numbers is unsustainable - 18,000 is the absolute limit according to researchers.
93	512	Residents Association			Wells House Road Residents Association		SP4		3 Headline concerns for Wells House Road Residents Association & its members 3.1 We object to the number of homes indicated in the Local Plan: 25,500 new homes and 55,000 jobs. These figures were set by the former mayor, Boris Johnson, before it was confirmed that large swathes of the OPDC space would be taken up by the Crossrail Depot and sidings. The figure has become somewhat of an unrealistic obsession and should be revised in line with the decrease in space. These figures have been challenged by experts including the University of Texas, and Cambridge and Berkeley Universities whose report (https://www.martincentre.arct.cam.ac.uk/seminars/joint-cambridge-berkeley-urban-design-charratte-2017/old-oak-common/view) concluded: "The target of 24,000 dwellings together with the 15 million sq ft of commercial space needed for 55,000 jobs will result in net residential densities higher than anything ever built in London. The team measured the gross site area and then calculated the net residential area after excluding land for the transit-hub and land for commercial space, open space and other uses. The net result was that an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London (our emphasis). The proposed densities would result in every block having a high-rise tower. The team demonstrated the implications of such high densities in terms of sunlight access on streets and blocks as well as the impact on the surrounding neighborhoods. They recommended a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance."
93	515	Residents Association			Wells House Road Residents Association		SP4		3.3 We are also concerned at the cart-pulling-the-horse approach for the master plan development, i.e. why Aecom hasn't been employed to guide the housing and business figures rather than being required to fit their designs with pre-existing and unrealistic numbers.

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93	527	Residents Association			Wells House Road Residents Association		SP4		There is also widespread concern about lack of commitment to building truly affordable family homes. Instead, local residents are deeply concerned that the OPDC seems committed to extending North Acton with plans for housing for transient renters and students as exemplified by the approval of the poorly designed Oaklands. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
93	528	Residents Association			Wells House Road Residents Association		SP4		There are also concerns that that affordable housing isn't really affordable to people who most need it, e.g. nurses, police, teachers, social workers, the elderly, first-time buyers, families with lower incomes, etc.
93	535	Residents Association			Wells House Road Residents Association		SP4		Overall, we do not wish Old Oak Common and Park Royal to become an extension of unpopular North Acton or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, poor design, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study); and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally. Student housing should not be used to fulfil necessary housing targets.
93	541	Residents Association			Wells House Road Residents Association		SP4		This all demonstrates a long-term need for a commitment to public services and support for the existing communities while the development takes place, e.g. retaining and even enhancing existing public transport (to allow for workers coming into the area over next 10-20 years); maintaining and improving the roads; tackling air pollution; looking at building sound barriers; keeping the area clean and free from litter and fly tipping; planting trees to help control the pollution from HGVs and dust; controlling the increasing HMOs/slum landlords; supporting the community through the years of dealing with the unresponsive HS2.
223	545	Local Resident	Eileen	Hannington			SP4		Powerday is bad enough, now we are having huge amount of accommodation being built, were is the green space for all these residents, Doctors, Dentists, hospital beds and schools ??? there is one sure thing, YOU are not living here.
223	546	Local Resident	Eileen	Hannington			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
223	556	Local Resident	Eileen	Hannington			SP4		We are dismayed that the draft Local Plan is targeting at least 22,350 additional homes between 2018-38 (building on the existing London Plan's target of 25,500 homes and 65,000 jobs in Old Oak). Neither the current draft Local Plan document nor the existing London Plan has ever offered credible research or transparent calculations showing how this huge target can be achieved. Our concern is heightened by academic studies which question these targets. In 2017, a review of the previous Local Plan by the Universities of Cambridge and Berkeley concluded that 18,000 homes was a realistic target and stated that current plans would create excessive density. The report's executive summary recommended: "a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance. As a result, the proposed development could be scaled to more closely match that of the surrounding neighborhoods." TITRA restates its concern that the OPDC will not reach its Local Plan housing target without relying too heavily on excessive housing density and high rise development that is out of kilter with existing neighbourhoods, as seen at North Acton and in the wholly out-of-scale new Oaklands development on Old Oak Common Lane. This high-density development is likely to result in unsustainable communities, place strain on existing social and transport infrastructure and harm existing communities. TITRA thinks Local Plan policy SP4 is unsound.
224	570	Local Resident	Alison	Brayshaw			SP4		I am a resident of Goodhall Street, London NW106TT and would like to object to this plan on the following reasons: Building a minimum of 22,350 additional homes represents over-development and excessive housing density which will overload local infrastructure such as the Tube.
225	630	Local Resident	Marta	Donaghey			SP4		I object to Policy SP4 as unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future
227	680	Local Resident	Jamie	Sutcliffe			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
107	878	Residents Association	Mark	Walker	TITRA		SP4		TITRA objects to policy SP4 which is unsound: building a minimum of 22,350 additional homes with an overall target of 25,500 in Old Oak (2018-38) represents over-development of this area and excessive housing density which will overload local infrastructure such as the Tube. An independent study by Cambridge and Berkeley universities concluded that 18,000 homes was the maximum sustainable on this site.
107	890	Residents Association	Mark	Walker	TITRA		SP4		Housing target – Policy SP4 We are dismayed that the draft Local Plan is targeting at least 22,350 additional homes between 2018-38 (building on the existing London Plan's target of 25,500 homes and 65,000 jobs in Old Oak). Neither the current draft Local Plan document nor the existing London Plan has ever offered credible research or transparent calculations showing how this huge target can be achieved. Our concern is heightened by academic studies which question these targets. In 2017, a review of the previous Local Plan by the Universities of Cambridge and Berkeley concluded that 18,000 homes was a realistic target and stated that current plans would create excessive density. The report's executive summary recommended: "a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance. As a result, the proposed development could be scaled to more closely match that of the surrounding neighborhoods." TITRA restates its concern that the OPDC will not reach its Local Plan housing target without relying too heavily on excessive housing density and high rise development that is out of kilter with existing neighbourhoods, as seen at North Acton and in the new and wholly out-of-scale Oaklands development by Genesis and QPR on Old Oak Common Lane. This high-density development across Old Oak, while retaining Park Royal's industrial base, is likely to result in unsustainable communities, place strain on existing social and transport infrastructure and harm existing communities. TITRA thinks Local Plan policy SP4 is unsound.
228	907	Local Resident	Pablo	Navarrete			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.

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114	918	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		2.1. We believe policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Underground station, especially as North Acton itself is likely to grow to 18,000 residents according to predictions.
114	928	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		3.2 Despite the changes made in the 19.2 version, certain fundamental aspects of the Local Plan have not changed. These include the assumption that 24,000 new homes can be built in the eastern half of the OPDC area in a way that achieves sustainable and successful regeneration. Despite the concerns expressed in responses from many local bodies and demonstrated in independent studies ¹ this core assumption remains unaltered in the 2018 Regulation 19.2 Draft.
114	929	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		3.3 The combination of these two factors has undermined confidence in the planning process undertaken by OPDC, and in the soundness of the 19.2 version of the Plan. On the one hand, proposals for the 'heart' of a new Old Oak (a high-density commercial development around the HS2/Queen Elizabeth Line station) no longer feature in the document and have been pushed back beyond the 2018-38 plan period. On the other, a housing target dating from the 2015 OAPF and included in a brief annexe to the 2015 Further Alterations to the London Plan has continued to be treated as sacrosanct. This has forced the Draft Plan towards a set of policies and housing densities which have become increasingly unsound and unjustified with each iteration of the Plan.
114	931	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: <ul style="list-style-type: none"> • The overall housing target for Old Oak and the related site allocations at Table 3. We consider the evidence base to support the housing target for Old Oak to be inadequate. Over the period 2015 — 2018, while planning for Old Oak has been in progress, development capacity analysis, masterplanning, and other supporting
114	932	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: <ul style="list-style-type: none"> • studies have become little more than circular exercises, coming back to a 24,000 figure which in our view is not adequately evidenced or justified.
114	938	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		4.1 The 2013 document A Vision for Old Oak and Park Royal was a relatively detailed document prepared by the GLA and the three Boroughs. It set out how this underused part of London could be used to deliver 19,000 new homes and 90,000 new jobs over an area of 10 square kilometres. It was followed by the Old Oak and Park Royal OAPF, adopted in November 2015 as a SPD to the 2015 London Plan. 4.2 The 2015 OAPF stated at paragraph 1.23 that Initial assessments undertaken by OPDC suggest that Old Oak and Park Royal combined could accommodate the delivery of 25,500 homes and 65,000 jobs. The Draft Further Alterations to the London Plan (2014) had previously noted the proposals for a rail interchange at Old Oak Common and stated Provision of public transport infrastructure on this scale would drive substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs. 4.3 The 2014 report of Planning Inspector Mr A Thicke on the FALP noted: I conclude below that the Mayor's estimate of objectively assessed housing need in London is justified by the evidence submitted to the EiP. Further, although I have reservations, I also consider that the FALP's strategy with regard to supply and distribution can be supported in the short term (our emphasis). 4.4 The Inspector explored the implications of housing targets set in the FALP and at paragraph 42 stated It cannot be assumed, in my view, that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases. Town centres are accessible locations but each has its own character which new development should respect. Opportunity Areas and large sites have the potential to determine their own character and identity but they should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage its environment such that it becomes an unpleasant place to visit, live and work (our emphasis). 4.5 The response of the Old Oak Neighbourhood Forum to the consultation on the Regulation 19.1 OPDC Local Plan questioned (in sec on 5) the basis of the OPDC Housing Evidence Statement, and the analysis of housing need at Old Oak, used to support the 24,000 new homes target. This material should also be considered here.
114	939	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		4.6. A new Draft London Plan has been published by the Mayor since the publication of the 19.1 OPDC Local Plan, this is one of the main reasons cited by OPDC for preparing a 19.2 version. This new London Plan has been consulted on but has yet to be examined in public. 4.7 The new Draft London Plan repeats a target of 25,500 new homes for the OPDC area (including new units in Park Royal). Targets set for the 2017 SHLAA published as part of the evidence base of the new London plan are stated as being 'informed' by the work undertaken by OPDC for its own Development Capacity study, and are not re-assessed or justified from first principles. Hence efforts by the public to identify how the original 24,000 housing target for Old Oak was first calculated are taken no further. This is a further example of the circular analysis of housing capacity and targets in different studies and draft plans, returning always to the same total figure.

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114	940	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		<p>14.8 Table 3.1 and Figure 3.17 on the Regula on 19.2 OPDC Local Plan are perhaps the most important pages in the document. These list, and show on a map, 31 site allocations for commercial and housing development across the OPDC area. Housing unit numbers for each site are expressed as a minimum. For a number of the sites shown, planning permissions have already been granted by OPDC on the basis of the Regula on 18 and 19 Local Plans as 'emerging policy' (coupled with an unadopted Scrubs Lane Development Framework Principles document).</p> <p>4.9 The text of Draft OPDC Policy SP10 on Integrated Delivery explains how these site allocations 'inform' OPDC's housing and jobs targets contained in Policies SP4 and SP5. It seems evident that the housing numbers allocated to each site have been derived through a combination of two sources:</p> <ul style="list-style-type: none"> • Developer aspirations and pre-application discussions with a number of developers (leading up to planning permissions already granted for major developments as shown in our table 1) [Table shows units/ha density on schemes granted by OPDC or LBE]. • OPDC working backwards from a 24,000 housing total at Old Oak in order to de ne potential 'development capacity' for each site, with the resultant densities being an arithmetic result rather than being policy led by site size, characteristics and/or planning principles on what makes for successful and sustainable living environments. <p>5. Evidence to support this assertion is covered in the next section of this consultation response, on housing density. It is on this basis that this submission supports StQW Forum consideration of key strategic policies SP4, SP5 and SP10 being unjustified and unsound.</p> <p>5.1 The 19.2 version of the Local Plan lowers the overall housing target for the OPDC area, in Policy SP4 Sustainable Communities, from 22,350 to 20,100 between 2018 and 2038. But this only because it has been recognised that development of key rail sites at Old Oak South is not feasible within the plan period. The lack of adequate justification for this amended overall target at Old Oak, as set out above, remains unchanged.</p>
114	958	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		<p>11.1 The extent to which it is legitimate to premise Local Plan policies on planned future transport infrastructure is a question which has no doubt arisen often at examinations of such plans. As stated in the NPPF (Paragraph 154) Local Plans should be aspirational but realistic. There must be limits to the extent that 'sound' policies can rest on transport or other infrastructure proposals which are themselves uncertain. This is particularly the case where draft policies are unorthodox, extreme, or fall outside policies in an extant superior strategic plan (in this instance the London Plan).</p> <p>11.2 In the case of the OPDC 19.2 Local Plan these limits (in our view) are being exceeded. A set of land use policies that leads to extreme housing density and building heights risks in a ng land values and attracting speculative development at cherry-picked locations. If the PTAL levels on which such policies are premised never materialise, the outcome will be incoming residents stranded in a construction wasteland, or a series of unsold and under-occupied developments.</p> <p>11.3 There is already some evidence of this risk in relation to developments granted permission by OPDC in early 2017 at Scrubs Lane, subject to conditions. Section S106 negotiations have proved protracted, conditions have not been discharged, and developments have yet to start. STQW Forum members in North Kensington, who have watched the progress of 'regeneration' at White City and at Earls Court (the Capco scheme) are well aware a planning approval does not mean that the same building (or a varied building) ever gets built.</p>
114	969	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		<p>Overall target of 24,000 new homes at Old Oak and related site allocations at Table 3.1 (NFFP Criterion not met)</p> <p>This target has remained the same since the 2015 OAPF despite significant subsequent changes in the constraints on development. Not based on objectively assessed need within the area, but on a London-wide assumption included within the 2014 FALP process with inadequate SEA evidence.</p> <p>Not positively planned, leading to unsustainable development.</p> <p>'Local Plans should be aspirational but realistic' (NPPF 154) and developed with meaningful collaboration and engagement with neighbourhoods' (NPPF 155). No regard has been had by OPDC to questioning by local organisations of the 24,000-housing target and consequent densities.</p>
114	981	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		<p>16.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority</p> <ul style="list-style-type: none"> • with a fixed approach to an unjustified housing target set pre-Brexit, and taking no account of changing demographic forecasts for London's population growth
114	982	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP4		<p>16.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority</p> <ul style="list-style-type: none"> • making substantive changes to its Draft Local Plan when HS2, TfL, Powerday and other bodies ag up the non-viability of development of key sites at the heart of the 2013 'vision' for Old Oak.
95	988	Local Resident	Mark	Walker			SP4		<p>Your policy SP4 targets 25,500 homes (and a minimum of 22,350) in Old Oak which is far too high. Cambridge and Berkeley universities went through the numbers in an independent study in 2017 and concluded that 18,000 homes was the maximum figure they considered to be sustainable. In any case, where is the evidence base for this 25K calculation? Residents have been asking the OPDC for four years for the reasoning and calculations behind this targets and still nothing credible has been produced. As it stands, this whole policy uses a finger in the air guess made by the Mayor's office many years ago; it doesn't hold water.</p>
35.b	1029	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	SP4		<p>We support the aims of this Policy, but would encourage the OPDC to work with partners, including QPR and SCD, to deliver as much early development as possible.</p>
231	1087	Local Resident	Eric	Leach			SP4		<p>The opportunity to build 1,000's of much need Social Homes for Rent in the OPDC has been missed.</p>
101	1097	Local Resident	Jason	Salkely			SP4		<p>I object to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.</p>
234	1296	Local Resident	Elaine	Gristock			SP4		<p>Policy SP4 proposes huge over-development: a further 22,350 additional homes in Old Oak (2018-38) will overload the local infrastructure, which already struggles in some ways. Independent academic studies say that 18,000 is a maximum target for local communities to be sustainable in the future.</p>

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103	1334	Local Resident	David	Turner			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
89	1344	Local Resident	Nicky	Guymer			SP4		TITRA objects to Policy SP4 is unsound: building a minimum of 22,350 additional homes in Old Oak (2018-38) represents over-development and excessive housing density which will overload local infrastructure such as the Tube. Independent studies by academic say that 18,000 is a maximum target for local communities to be sustainable in the future.
236	1358	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		SP4		Housing targets are just that. Homes are needed for families, elderly, key workers etc. These homes need to be truly affordable. The social infrastructure for these new homes needs to be in place and not an afterthought ie doctors surgeries, dentists, schools, nurseries local shops etc.
82	1371	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		2.2 Despite the changes made in the 19.2 version, certain fundamental aspects of the Local Plan have not changed. These include the assumption that 24,000 new homes can be built in the eastern half of the OPDC area in a way that achieves sustainable and successful regeneration. Despite the concerns expressed in responses from many local bodies and demonstrated in independent studies ¹ this core assumption remains unaltered in the 2018 Regulation 19.2 Draft.
82	1372	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		2.3 The combination of these two factors has undermined confidence in the planning process undertaken by OPDC, and in the soundness of the 19.2 version of the Plan. On the one hand, proposals for the 'heart' of a new Old Oak (a high density commercial development around the HS2/Queen Elizabeth Line station) no longer feature in the document and have been pushed back beyond the 2018-38 plan period. On the other, a housing target dating from the 2015 OAPF and included in a brief annexe to the 2015 Further Alterations to the London Plan has continued to be treated as sacrosanct. This has forced the Draft Plan towards a set of policies and housing densities which have become increasingly unsound and unjustified with each iteration of the Plan.
82	1374	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		2.6 The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: " The overall housing target for Old Oak and the related site allocations at Table 3.1. We consider the evidence base to support the housing target for Old Oak to be inadequate. Over the period 2015 — 2018, while planning for Old Oak has been in progress, development capacity analysis, masterplanning, and other supporting studies have become little more than circular exercises, coming back to a 24,000 figure which in our view is not adequately evidenced or justified.
82	1380	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		3.1 The 2013 document A Vision for Old Oak and Park Royal was a relatively detailed document prepared by the GLA and the three Boroughs. It set out how this underused part of London could be used to deliver 19,000 new homes and 90,000 new jobs over an area of 10 square kilometres. It was followed by the Old Oak and Park Royal OAPF, adopted in November 2015 as a SPD to the 2015 London Plan. 3.2 The 2015 OAPF stated at paragraph 1.23 that Initial assessments undertaken by OPDC suggest that Old Oak and Park Royal combined could accommodate the delivery of 25,500 homes and 65,000 jobs. The Draft Further Alterations to the London Plan (2014) had previously noted the proposals for a rail interchange at Old Oak Common and stated Provision of public transport infrastructure on this scale would drive substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs. 3.3 The 2014 report of Planning Inspector Mr A Thickett on the FALP noted: I conclude below that the Mayor's estimate of objectively assessed housing need in London is justified by the evidence submitted to the EiP. Further, although I have reservations, I also consider that the FALP's strategy with regard to supply and distribution can be supported in the short term (our emphasis). 3.4 The Inspector explored the implications of housing targets set in the FALP and at paragraph 42 stated It cannot be assumed, in my view, that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases. Town centres are accessible locations but each has its own character which new development should respect. Opportunity Areas and large sites have the potential to determine their own character and identity but they should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage its environment such that it becomes an unpleasant place to visit, live and work (our emphasis). 3.5 The response of the Old Oak Neighbourhood Forum to the consultation on the Regulation 19.1 OPDC Local Plan questioned (in section 5) the basis of the OPDC Housing Evidence Statement, and the analysis of housing need at Old Oak, used to support the 24,000 new homes target. This material is supported by the StQW Forum and is not repeated here.
82	1381	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		3.6 A new Draft London Plan has been published by the Mayor since the publication of the 19.1 OPDC Local Plan This is one of the main reasons cited by OPDC for preparing a 19.2 version. This new London Plan has been consulted on but has yet to be examined in public. The StQW Forum responded to the consultation on the London Plan, and those sections of our response relating to the OPDC area are at Annexe 1 below. 3.7 The new Draft London Plan repeats a target of 25,500 new homes for the OPDC area (including new units in Park Royal). Targets set for the 2017 SHLAA published as part of the evidence base of the new London plan are stated as being 'informed' by the work undertaken by OPDC for its own Development Capacity study, and are not re-assessed or justified from first principles. Hence efforts by the public to identify how the original 24,000 housing target for Old Oak was first calculated are taken no further. This is a further example of the circular analysis of housing capacity and targets in different studies and draft plans, returning always to the same total figure.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
82	1382	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		<p>3.8 Table 3.1 and Figure 3.17 on the Regulation 19.2 OPDC Local Plan are perhaps the most important pages in the document. These list, and show on a map, 31 site allocations for commercial and housing development across the OPDC area. Housing unit numbers for each site are expressed as a minimum. For a number of the sites shown, planning permissions have already been granted by OPDC on the basis of the Regulation 18 and 19 Local Plans as 'emerging policy' (coupled with an unadopted Scrubs Lane Development Framework Principles document).</p> <p>3.9 The text of Draft OPDC Policy SP10 on Integrated Delivery explains how these site allocations 'inform' OPDC's housing and jobs targets contained in Policies SP4 and SP5. It seems evident that the housing numbers allocated to each site have been derived through a combination of two sources:</p> <p>" Developer aspirations and pre-application discussions with a number of developers (leading up to planning permissions already granted for major developments as shown in our table 1 overleaf). [Table shows units/ha density on schemes granted by OPDC or LBE].</p> <p>" OPDC working backwards from a 24,000 housing total at Old Oak in order to define potential 'development capacity' for each site, with the resultant densities being an arithmetic result rather than being policy led by site size, characteristics and/or planning principles on what makes for successful and sustainable living environments.</p> <p>3.10 Evidence to support this assertion is covered in the next section of this consultation response, on housing density. It is on this basis that the StQW Forum considers key strategic policies SP4, SP5 and SP10 to be unjustified and unsound.</p> <p>3.11 The 19.2 version of the Local Plan lowers the overall housing target for the OPDC area, in Policy SP4 Sustainable Communities, from 22,350 to 20,100 between 2018 and 2038. But this only because it has been recognised that development of key rail sites at Old Oak South is not feasible within the plan period. The lack of adequate justification for this amended overall target at Old Oak, as set out above, remains unchanged.</p>
82	1400	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		<p>6.1 The extent to which it is legitimate to premise Local Plan policies on planned future transport infrastructure is a question which has no doubt arisen often at examinations of such plans. As stated in the NPPF (Paragraph 154) Local Plans should be aspirational but realistic. There must be limits to the extent that 'sound' policies can rest on transport or other infrastructure proposals which are themselves uncertain. This is particularly the case where draft policies are unorthodox, extreme, or fall outside policies in an extant superior strategic plan (in this instance the London Plan).</p> <p>6.2 In the case of the OPDC 19.2 Local Plan these limits (in our view) are being exceeded. A set of land use policies that leads to extreme housing density and building heights risks inflating land values and attracting speculative development at cherry-picked locations. If the PTAL levels on which such policies are premised never materialise, the outcome will be incoming residents stranded in a construction waste-land, or a series of unsold and under-occupied developments.</p> <p>6.3 There is already some evidence of this risk in relation to developments granted permission by OPDC in early 2017 at Scrubs Lane, subject to conditions. Section S106 negotiations have proved protracted, conditions have not been discharged, and developments have yet to start. Our Forum members in North Kensington, who have watched the progress of 'regeneration' at White City and at Earls Court (the Capco scheme) are well aware a planning approval does not mean that the same building (or a varied building) ever gets built.</p>
82	1411	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		<p>Overall target of 24,000 new homes at Old Oak and related site allocations at Table 3.1 (Paragraph 3 above)</p> <p>This target has remained the same since the 2015 OAPF despite significant subsequent changes in the constraints on development. Not based on objectively assessed need within the area, but on a London-wide assumption included within the 2014 FALP process with inadequate SEA evidence.</p> <p>Not positively planned, leading to unsustainable development. 'Local Plans should be aspirational but realistic' (NPPF 154) and developed with meaningful collaboration and engagement with neighbourhoods' (NPPF 155). No regard has been had by OPDC to questioning by local organisations of the 24,000-housing target and consequent densities.</p>
82	1423	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		<p>10.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority</p> <ul style="list-style-type: none"> • with a fixed approach to an unjustified housing target set pre-Brexit, and taking no account of changing demographic forecasts for London's population growth
82	1424	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP4		<p>10.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority</p> <ul style="list-style-type: none"> • making substantive changes to its Draft Local Plan when HS2, TfL, Powerday and other bodies flag up the non-viability of development of key sites at the heart of the 2013 'vision' for Old Oak.
110.b	1568	Community Group	Robin	Brown	Grand Union Alliance		SP4		<p>Our area and neighbourhoods are deprived in terms of education. The development districts currently do not have a school. Education should be a prime consideration, encouraging integrated, accessible schools at every level. Furthermore there is a need for technical education and training. With new, high levels of accessibility, this will be an ideal location for joint ventures with local industry in developing job skills.</p>
237	1581	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP4		<p>The proposed densities would result in every block having a high-rise tower which clearly demonstrates the implications of such high densities in terms of sunlight access on streets and blocks as well as the impact on the surrounding neighbourhoods. WARA members would like to see a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance.</p>
237	1582	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP4		<p>We feel the obsession with the housing target figures is likely to lead to unpalatable development and therefore, our major objection is to the numbers which need a drastic revision. Remember, this may have been almost achievable back in the Boris days before he allowed the Crossrail depot and sidings to take over the lion's share of the Old Oak space. However, they never revised the figures to take this into account.</p>
237	1585	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP4		<p>The need for 'targeted housing' to fulfil needs for TRULY AFFORDABLE homes for families, younger people and the elderly rather than fulfilling Boris' old unrevised housing target numbers for the area. (Could it be that families and the elderly are being ignored as they cost more in terms of social infrastructure needs? These groups need schools, nurseries, medical care, services, retailers, etc. ... - whereas students need nothing but cheap supermarkets & takeaways!)</p>
237	1589	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP4		<p>Concerns over the loss of community - during development and after completion</p>

Policy SP5: Economic Resilience

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	37	Planning Consultant	Ashley	Collins	JLL	Imperial College	SP5	Para 3.27	Imperial College London welcomes the proposed delivery of 40,400 new jobs over the next 20 years and the creation of a major new commercial centre. The approach of amending the boundary for the designated Strategy Industrial Land (SIL) to enable a wider mix of employment uses within Old Oak is supported. In the final drafting, it is requested that paragraph 3.27 be expanded to give a specific reference that explicitly supports research & development, life sciences, medical and high-tech businesses.
13	231	Strategic Partner	Paul	Gilfedder	HS2 Ltd.		SP5		Since September 2017, OPDC has worked with HS2 Ltd to facilitate development adjacent to the Old Oak Common Station, on land known as the triangle site, which sits between the high speed rail and conventional rail corridors. The development site could contribute to achieving the vision of a new commercial centre around Old Oak Common station, but development on, or over Old Oak Common station remains outside the scope of the station works.
113	419	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP5		Although reports describe our area as 'deprived', at least 75 businesses have been closed so far by HS2 with up to 2,000 jobs lost. We require a commitment by OPDC to generating local jobs immediately. There is a need for training programmes and opportunities for local people to work on both the area development and in new businesses created by the development. There should be equal opportunities for people across age groups, gender, cultures and to include people with disabilities. In particular, many local people do not have access to the internet and we need investment in training and the provision of computers with broadband connection for these people.
93	537	Residents Association			Wells House Road Residents Association		SP5		Although reports describe our area as 'deprived', at least 75 businesses have been closed so far by HS2 with up to 2,000 jobs lost. We require a commitment by OPDC to generating local jobs immediately. There is a need for training programmes and opportunities for local people to work on both the area development and in new businesses created by the development. There should be equal opportunities for people across age groups, gender, cultures and to include people with disabilities. In particular, many local people do not have access to the internet and we need investment in training and the provision of computers with broadband connection for these people.
28	709	Strategic Partner	Lucinda	Turner	Transport for London		SP5	Figure 3.7	TfL requests that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period. This comment is also relevant to a number of other figures in the document e.g. Figure 3.7, 3.15, 10.3
35.b	1030	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	SP5	3.7	We support the identification of a new Major Town Centre in Old Oak North as illustrated on Figure 3.7. The early development of the EMR site can make a major contribution to this Centre and QPR and SDC are keen to work with the OPDC to achieve this.
235	1306	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	SP5		Comment: The jobs target is significantly reduced from 67,900 to 40,400 over the plan period. The reason given for this significant reduction is to reflect the new jobs targets in the 'Development Capacity Study'. However, a weakness of this evidence base document is that it assesses the Park Royal SIL designation as a single, broad location. The Site Assessment Table at Appendix A recognises that for the Park Royal SIL designation, "work is in progress to define specific sites suitable for intensification". Changes sought: Further work is required that considers individual sites within the Park Royal SIL designation, which is a 250-ha site. We consider that this new jobs target is potentially unsound as it is not clear that it is informed by a robust evidence base. This is critical, as it underpins all subsequent policy relating to economic growth and the intensification of industrial units at Park Royal, but this foundation is not positively prepared
110.b	1561	Community Group	Robin	Brown	Grand Union Alliance		SP5		At the same time, there has never been a problem in London in having a rich variety of all types of jobs close to homes. Many boroughs have people living comfortably adjacent to industry and offices. Such can be the case at Old Oak Common and Park Royal, but with each area adopting a somewhat different approach with regard to mix of uses, and a scale and character of different areas. Close to the stations will be "city", but closer to the scale and character of what we know to work, and, which identifies London. Alternatively, a number of adjacent areas could take on the scale of a high street, or form a small town centre. By distributing homes and jobs, the area will take on a greater sense of diversity, be more affordable, and "spread the load" of housing need, as opposed to it being in tower blocks at the centre.
237	1588	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP5		Need for local jobs
120	1622	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		SP5		HNF welcomes the OPDC and the Local Plan's support for surrounding areas – (specifically Harlesden).

Policy SP6: Places and Destinations

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	190	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	SP6		We welcome the clarification in relation to meanwhile uses.
92.b	432	Community Group	Melanie	Whitlock	The Hammersmith Society		SP6		Policy SP6 Places and Destinations. While we support the creation of a new Cultural Quarter at Old Oak, we have for many years argued in favour of a major, "headline" cultural catalyst in the area. The original Old Oak OAPF referred in Key Objective 3 to "large scale catalyst uses ...such as art, leisure or cultural centre". This ambition has disappeared from the vision for Old Oak, and SP6 speaks in very general terms of "support" for such uses. More is needed if the area is to be more than a dense dormitory zone. We urge the OPDC to plan positively, to be inspired by the Olympic Park, and to seek proactively to bring a major catalyst which would be unique to the area and bring visitors and new residents flocking to it.
47	579	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		SP6		SP6 should make direct reference to Kensal Canalside Opportunity Area' to fulfil the Duty to Cooperate. It is suggested that "Our proposed outcome" should insert "...and complements existing and emerging surrounding town centres."
119	847	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP6	a)	Agree placemaking is about creating and delivery of new uses but should also refer to protection of valuable heritage and environmental assets Proposed Changes: Policy a) Add: iv) Celebrates, retains and protects valuable environmental and natural heritage Supporting Text should include: ...placemaking is strengthened by the retention of valuable heritage assets both natural and recreational. New development should reflect this local distinctiveness
119	863	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP6	Fig. 3.8	Appears to show Wormwood Scrubs Street within Wormwood Scrubs 'This does not agree with P12 Fig 4.45 or Fig 3.7. Need consistency of approach for all illustrations showing Wormwood Scrubs Street i.e. show WSS in P1 not P12 NB this inconsistency occurs in several illustrations throughout the plan
229	1002	Local Resident	Alan	Goodearl			SP6		To encourage mixing there needs to be something really special about an area: to draw-in people who neither work nor live there. Leisure aspects of the plan seem focussed on parks. These will no doubt be enjoyed by the people living within the development. Few from outside, though, will make the journey in to see them, especially when they have Wormwood Scrubs close-by. Early on there was talk of housing the reserve collection of one of the great national museums; is hope of that now lost? If it is then, might something new be created, perhaps in collaboration with the local museum services or with the Museum of London. I work in the museum sector and have seen the impact museums and galleries can make in previously neglected / uninspiring areas. There is a wealth of history here, both human and industrial, to be brought-out. There are many artists and crafts people working in the area who need a place to show their work.
35.b	1031	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	SP6		The supporting text of this Policy should acknowledge the early role the development of Oaklands will have in delivering regeneration and beginning the process of integrating new development with the existing community at Atlas Junction. The concurrent development of Oaklands North could add to this if it could progress now. Furthermore, as mentioned above, the early development of EMR can make a significant contribution to delivering placemaking in Old Oak North and QPR and SCD want to work with the OPDC to achieve this.
100	1363	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		SP6		The Corporation has further asserted that all such policies in the 'Place' chapters are 'strategic' rather than 'non-strategic' policies (see the statement at paragraph 1.2.3 of the 19.2 Draft). We do not believe that these policies meet the criteria for non-strategic policies as set out at NPPG paragraphs 075 and 076. We consider this part of the 19.2 Draft to be contrary to the NPPF and as such unsound.
110.b	1571	Community Group	Robin	Brown	Grand Union Alliance		SP6		In Summary All great plans are local, in respecting local inhabitants, and in recognizing the particular problems and potentials of an area to be redeveloped, and adjacent neighbourhoods. The current plan is not achievable and could bring considerable harm to the area by promoting a largely isolated station complex flanked by tower blocks that have little to do with the character and economy of this part of west London. However, a revised strategy that sees a "greater spread", and hence diversity of housing, while creating a wide job based economy, and an emphasis on health, environment, and a high quality of life, is entirely achievable. We consider that the time is now right to plan and design an "appropriate London", not an assemblage that could invade any city in the world, but one that truly fits and sends a clear message that London and the future of its environment is important.

Policy SP7: Connecting People and Places

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
90	142	Local Resident	John	Cox			SP7	b) ii)	POLICY b) ii): Add at the end: "including segregated cycling routes to all railway stations". Reason: It would be unacceptable if rebuilt and other sections of Old Oak Common Lane are not provided with segregated cycle lanes. That road, after all, leads to the main entrance of the HS2 and Great Western Main Line (GWML) joint station, as well as to the Old Oak Common Lane station. High Speed 2 Ltd. is using this position of the OPDC as an excuse for not sufficiently widening its new GWML bridges on that road: "because the road won't have segregated cycle lanes anyway". Without that extra wording you are undermining POLICY d: "embedd[ing] transport infrastructure into the built environment".

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
90	143	Local Resident	John	Cox			SP7	e) iv)	POLICY e) iv): Add at the end: "via Scrubs Lane and Old Oak Common Lane". Reason: You do not need such connections across the Intercity Express Programme (IEP) depot during the Local Plan period, and the IEP depot deserves protection as operational railway land, even if it stops being an IEP depot.
90	144	Local Resident	John	Cox			SP7	3.54	3.54: Change the wording: "access only provided for private vehicles" to be clearer: "private vehicles having local access only and no through route".
113	408	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP7		Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would go onto the already congested Old Oak Common lane. We would request that roads and transport infrastructure are put in tunnels to allow for more space for housing and green space.
19.b	495	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		SP7		The Local Plan sees transport as the catalyst for the comprehensive regeneration of Old Oak and integral to the intensification of the Park Royal industrial estate. Substantial improvements to public transportation are planned with the aim of creating high quality, safe and accessible movement networks that reduce the need to travel and prioritise sustainable transport modes. This is justifiably seen as enabling people to live healthier and more active lifestyles – with resulting social, economic and environmental benefits.
93	526	Residents Association			Wells House Road Residents Association		SP7		Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would go onto the already congested Old Oak Common lane. We would request that roads and transport infrastructure are put in tunnels to allow for more space for housing and green space.
47	580	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		SP7	E) iii)	Policy SP7 sets a framework for ensuring proposals contribute to an accessible movement network across the OPDC area. Figure 3.10 sets out this movement network but shows a 'potential connection' east-west from Scrubs Lane towards Kensal OA. This should be amended to have the same status as the other connections highlighted in the plan. Delivery of this connection within OPDC is essential to the delivery of the Vision and Objectives K&C have for Kensal OA.
28	717	Strategic Partner	Lucinda	Turner	Transport for London		SP7	Policy and Figure 3.9	Transport Hierarchy – The transport hierarchy implies that pedestrians and cyclists should be prioritised ahead of public transport. TfL would prefer this to emphasise that there should be priority for pedestrians, cyclists and buses in the overall strategy for roads to ensure consistency with the approach taken in the MTS, which sets an overall mode share target for sustainable modes. Supporting active modes is clearly a key priority but the MTS acknowledges that journey distance plays a role in mode choice and identifies public transport as the preferred transport mode for trips that are too long to walk or cycle.
28	718	Strategic Partner	Lucinda	Turner	Transport for London		SP7	Policy and Paragraph 4.1	TfL is pleased that the MTS policies for mode shift away from the car (including the target for an 80% non-car mode share) and a restraint based approach to car parking for new development are now incorporated in Strategic Policy SP7.
28	719	Strategic Partner	Lucinda	Turner	Transport for London		SP7	Policy part b (iv)	TfL is pleased that part b (iv) has been strengthened and clarified for consistency with policy T4.
28	720	Strategic Partner	Lucinda	Turner	Transport for London		SP7	Policy part c	TfL is pleased that additional references to safety, and accessibility have been included in part c as these are key Mayoral priorities
28	721	Strategic Partner	Lucinda	Turner	Transport for London		SP7	Policy part g (ii), Paragraphs 4.10 & 4.12	TfL welcomes clarification of the function of key routes including the need to restrict private vehicles to access only. Access restrictions and/or public transport priority measures will be needed to manage the amount of vehicle traffic in the core Old Oak area.
28	722	Strategic Partner	Lucinda	Turner	Transport for London		SP7	Policy part b (iii) and Paragraph 4.2	Reference to 'potential' new London Overground stations in paragraph 4.2 is welcomed. Although TfL supports the ambition to optimise PTALs we are concerned about the practicality of achieving a 'minimum PTAL of 6b' across the whole of the Old Oak area. This is shown by referring to figure 7.11 which shows areas of 6a. Although it will be possible to achieve the highest PTALs in the area immediately around new or enhanced stations it is unlikely that this will extend across the whole area even after planned/potential transport improvements. TfL recommends that the wording is altered to read 'achieve up to a PTAL of 6b'
33	800	National Body	Mark	Furnish	Sport England		SP7		Many of the Strategic Polices or supporting text reference active and heathy lifestyles, contributing towards a healthy place and delivering Healthy Streets (paragraph 3.17), active destinations (Policy SP6), active travel (Policy SP7) and discuss interconnecting places (Policy SP7). Furthermore, as noted above, improving health and wellbeing is identified as an opportunity for the area. These aspects are welcomed by Sport England but, with the exception of Healthy Streets, no steer is given to stakeholders on how to potentially achieve a healthy place. The Mayor's Healthy Streets is a good tool but Sport England considers that creating active places and encouraging communities to become active goes beyond Healthy Streets. The Draft Local Plan does touch upon some aspects to consider in paragraph 3.17 but links to Active Design, as highlighted in Sport England's previous submission, would really be of benefit to not only developers but also OPDC planners, as it highlights the principles to consider when designing in actively and creating healthy places. It also highlights case studies that could be used to inspire development within Old Oak and Park Royal. Healthy Streets is one such example but, as can be seen from the guidance, there are other aspects that can be implemented in order to create active places. As previously set out, Sport England would happily work alongside OPDC to draw out the Active Design principles within the Local Plan and create links between the guidance and documents. Further details on Active Design can be found at https://www.sportengland.org/facilities-planning/active-design/
119	856	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP7	e) iv)	We support the proposals of Fig 7.5 Indicative Future Walking Network and Fig 7.7 Indicative Future Cycling Network. This shows how access to Wormwood Scrubs is provided from surrounding areas. Access to the Scrubs should be considered as part of the GIOSSMP There is a clear conflict between retaining the scrubs as an open space that is more wild than tamed and of encouraging more access through which could destroy its character without increasing any access to nature. Add supporting text to clarify that: • protecting biodiversity and improving access might be conflicting aims in some areas and must be considered as part of the GIOSSMP. There should be less access in the most sensitive areas • any access onto the scrubs needs to be considered with regard to the Wildlife sensitivities and should not be proposed until a GIOSSMP is in place

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
119	857	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP7	e) iv)	Change Policy e) iv) new and enhanced pedestrian and cycle connections to Wormwood Scrubs (not into) N.B. This is not the only place in the document where this change (to rather than into) needs to be made.
119	861	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP7		Encouraged to see that in the Plan, as opposed to supporting documents above, the connections from Old Oak South and the Station now exit onto WSS rather than Wormwood Scrubs itself. The Northern embankment is one of the more sensitive Habitats on the Scrubs. Fragmentation by 'improved' access would see it decline in value.
119	862	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP7	3.57	Although WSS route is less certain than others we would recommend stronger character proposals in the supporting text 3.57. 3.57 should be amended to include: <ul style="list-style-type: none"> • Change name to Wormwood scrubs Lane rather than Street. Assuming this is more than a placeholder name. This would be in line with the other routes surrounding Scrubs where development is only on one side and would reinforce proposed typology • In line with EU1 c (iii) Green streets. SP8 Fig 3.13 Shows this route as an Urban Green Corridor and as a location with small areas of publicly accessible open space • For pedestrians and Cycles only (not a bus route according to Fig 7.14) • Make clear statement that this route has no connection south through the embankment onto the Scrubs. • Clarify if Fig 7.3 is an illustration of what WSS might look like?
114	935	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP7		The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: <ul style="list-style-type: none"> • Unjustified reliance placed on increased levels of public transport accessibility through new infrastructure which may never be built. While the HS2 and Queen Elizabeth Line stations are a near certainty, the two 'potential' Overground stations at Hythe Road and at Old Oak Common Lane are by no means definite projects. Fall-back policies based on a new bus network are seen by local people as unviable given congestion levels on the existing road network.
114	959	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP7		11.4 In its 11.09.17 response to the OPDC 19.1 Local Plan, Transport for London were clear in relation to the proposed Overground stations at Hythe Road and at old Oak Common Lane that 'the stations are not yet committed or funded and should be referred to as 'potential' new stations throughout the document.' In recent months the extent of TfL's budget problems has been widely publicised, with an expected operational deficit of £968m in 2018/19. Delays on completion of Elizabeth Line stations are expected to worsen this deficit. As a result of the fall in fares revenue and the end of its government subsidy, TfL has cut its local implementation plan funding to boroughs, and suspended its programme of renewals on the road network. <p>11.5 This response to the 19.1 OPDC Plan from TfL on the Overground stations is in contrast to TfL comments in October 2016 on the planning application for development at 93-97a Scrubs Lane. These stated, without qualification or reservation ... the site records a Public Transport Access Level of 1b (PTAL), on a scale from 1 to 6b (6b being the best). However, there are extensive planned transport improvements for the Opportunity Area, which will enhance the site's access to public transport e.g. the proposed Hythe Road station will be located approximately 250m to the west of the site, giving access to the London Overground network; and the Old Oak Common HS2 station located 500m to the south-west of the site. The site is expected to achieve a PTAL of 5-6a as a result of the proposed transport improvements in the wider Old Oak and Park Royal OA (our emphasis).</p> <p>11.6 It is unsurprising that the public become cynical about the planning system when a key public body (and member of the Mayoral family) is willing at one moment to provide supportive comments to OPDC on an unpopular planning application, transforming at a stroke of the pen a 1b PTAL level into a 5-6a level when it suits, while subsequently cautioning OPDC against over-optimistic assumptions on realisation of the very same proposed transport infrastructure.</p>
114	972	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP7		Unjustified reliance placed on increased levels of public transport accessibility (NFFP Criterion not met) <p>Key policies in the 19.2 Dra Local Plan (SP1, SP2, SP9, D5, T1-T4 are premised on the area achieving the 'highest' levels of public transport accessibility. Currently large parts of Old Oak North and Scrubs Lane are level 1b (WebCAT tool). Responses from TfL to the Reg 19.1 Draft Plan make clear that a new Overground station at Hythe Road is an uncertain proposition, and subsequently large deficits have emerged in TfL budgets. These extreme policies are not justified on the evidence available.</p>
229	1001	Local Resident	Alan	Goodearl			SP7		The development of London's docklands suffered from a lack of links (physical and human) between old and new communities. I hope these mistakes are not repeated. Living in Harlesden/ Kensal Green I worry in particular about the links north, which look to have been rather cut-back in the revised plans. Harlesden, especially, has a lot to give. It is a successful and really vibrant multi-ethnic place, with strong religious groups, shops and community activities that new residents might want to join. There is also deprivation in Harlesden, and a need for work, so it would be good if Harlesden people could get easily to newly developed areas to work there.
35.b	1032	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	SP7		The Policy should at paragraph g) also acknowledge the importance of the early delivery of the link to Willesden Junction Station. The supporting text of this Policy should also acknowledge the potential for the early delivery of the new link from EMR to Willesden Junction Station, which will provide an essential part of the new movement network linking to the existing Station interchange and acting as a catalyst for early development in Old Oak North. Additionally, the development of Park Road, the first part of which will be delivered in conjunction with Oaklands, can be progressed now through the continued development of Oaklands North and the delivery of a new bridge over the Grand Union Canal to also open up development in Old Oak North.
56	1113	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		SP7	Para 3.59	The paragraph should also include reference to how the Grand Union Canal has evolved as an important nature and biodiversity corridor and any movement and uses within and along the canal should harmonise with this green corridor.
235	1307	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	SP7		Comment: The stated aim is to support the Mayor's "ambition" for 80% of journeys in London to be made by walking, cycling or public transport. This ambition is not compatible with a Strategic Industrial Location. This should not impede upon the functioning and business operations at Park Royal West. Changes sought: Recognition that this stated strategic aim should not compromise the function of SIL, which is largely dependent on use of motor vehicles. A realistic and generous approach to vehicle movements and parking should be introduced to make it easier and more attractive for businesses to continue to operate from the SIL.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
235	1308	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	SP7		Comment: This policy requirement has been amended to seek to discourage the use of private motorised vehicles and limit car parking. Again, this is not compatible with SIL as this would significantly impede upon the functioning and business operations at Park Royal West and make it a less attractive base to operate from. This is particularly so for the transport intensive uses, such as transport and logistics operations and distribution centres, that have been increasingly attracted to Park Royal West. Changes sought: The policy should be amended to read: "discouraging the use of private motorised vehicles car journeys and limiting car parking outside of the Park Royal Industrial Estate;"
82	1377	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP7		2.6 The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: Unjustified reliance placed on increased levels of public transport accessibility through new infrastructure which may never be built. While the HS2 and Queen Elizabeth Line stations are a near certainty, the two 'potential' Overground stations at Hythe Road and at Old Oak Common Lane are by no means definite projects. Fallback policies based on a new bus network are seen by local people as unviable given congestion levels on the existing road network.
82	1401	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP7		6.4 In its 11.09.17 response to the OPDC 19.1 Local Plan, Transport for London were clear in relation to the proposed Overground stations at Hythe Road and at old Oak Common Lane that 'the stations are not yet committed or funded and should be referred to as 'potential' new stations throughout the document.' In recent months the extent of TfL's budget problems have been widely publicised, with an expected operational deficit of £968m in 2018/19. Delays on completion of Elizabeth Line stations are expected to worsen this deficit. As a result of the fall in fares revenue and the end of its government subsidy, TfL has cut its local implementation plan funding to boroughs, and suspended its programme of renewals on the road network. 6.5 This response to the 19.1 OPDC Plan from TfL on the Overground stations is in contrast to TfL comments in October 2016 on the planning application for development at 93-97a Scrubs Lane. These stated, without qualification or reservation ... the site records a Public Transport Access Level of 1b (PTAL), on a scale from 1 to 6b (6b being the best). However, there are extensive planned transport improvements for the Opportunity Area, which will enhance the site's access to public transport e.g. the proposed Hythe Road station will be located approximately 250m to the west of the site, giving access to the London Overground network; and the Old Oak Common HS2 station located 500m to the south-west of the site. The site is expected to achieve a PTAL of 5-6a as a result of the proposed transport improvements in the wider Old Oak and Park Royal OA (our emphasis). 6.6 It is unsurprising that the public become cynical about the planning system when a key public body (and member of the Mayoral family) is willing at one moment to provide supportive comments to OPDC on an unpopular planning application, transforming at a stroke of the pen a 1b PTAL level into a 5-6a level when it suits, while subsequently cautioning OPDC against over-optimistic assumptions on realisation of the very same proposed transport infrastructure.
82	1414	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP7		Unjustified reliance placed on increased levels of public transport accessibility (Paragraph 6 above) Key policies in the 19.2 Draft Local Plan (SP1, SP2, SP9, D5, T1-T4 are premised on the area achieving the 'highest' levels of public transport accessibility. Currently large parts of Old Oak North and Scrubs Lane are level 1b (WebCAT tool). Responses from TfL to the Reg 19.1 Draft Plan make clear that a new Overground station at Hythe Road is an uncertain proposition, and subsequently large deficits have emerged in TfL budgets. These extreme policies are not justified on the evidence available.
110.b	1558	Community Group	Robin	Brown	Grand Union Alliance		SP7		The current plan indicates an island approach to the stations, which can work well in changing from HS2 to the Elizabeth Line, but does not stimulate the local economy.
110.b	1559	Community Group	Robin	Brown	Grand Union Alliance		SP7		Many may indicate that the following is impractical, or even impossible, but the large rail depots and other barriers, and large accessible sites in proximity to the new stations must be relocated at an early stage. This land opportunity, adjacent to what could be London's most important station, is too important to have its potential inhibited, its construction site severely restricted, and with little opportunity for the local community to have either close or easy access, or new affordable homes.
110.b	1565	Community Group	Robin	Brown	Grand Union Alliance		SP7		A success of the London East Docklands redevelopment is that it linked with adjacent areas from the onset, largely brought about by the innovative, and relatively affordable Docklands Light Rail. Thus adjacent areas could gain benefit as well as newcomers. We consider that an efficient, perhaps unique local transit system is required not only to benefit the new stations, but also local industry and neighbourhoods, and where it is recognized that the majority cannot, and perhaps almost everyone will not travel by car.
237	1586	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP7		The need for better road infrastructure and building this underground rather than overground.
237	1590	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP7		Major concerns of North and West Acton residents are being ignored in particular to no impact assessments have been done for utilities and traffic infrastructure!

Policy SP8: Green Infrastructure and Open Space

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
113	424	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP8		We also need meanwhile facilities and green space. Currently, Wells House Road residents have NO GREEN SPACE for family and children use. Wormwood Scrubs is poorly maintained on the Western edge and is filled with litter. This area currently attracts groups of men drinking and taking drugs and that makes Wormwood Scrubs feel unsafe and inaccessible to Wells House Road residents. Facilities like playgrounds for families and children are 20-30 minutes' walk from Wells House Road and means having to walk by road to avoid the western edge of the Scrubs. No time is more important than now for there to be safe areas to play for our children.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
93	542	Residents Association			Wells House Road Residents Association		SP8		We also need meanwhile facilities and green space. Currently, Wells House Road residents have NO GREEN SPACE for family and children use. Wormwood Scrubs is poorly maintained on the Western edge and is filled with litter. This area currently attracts groups of men drinking and taking drugs and that makes Wormwood Scrubs feel unsafe and inaccessible to Wells House Road residents. Facilities like playgrounds for families and children are 20-30 minutes' walk from Wells House Road and means having to walk by road to avoid the western edge of the Scrubs. No time is more important than now for there to be safe areas to play for our children.
119	868	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP8		Encouraged by this policy in particular aims to 'conserve and enhance existing green infrastructure a) i) and biodiversity habitats b) i) Policy SP8 c) suggests that proposals successfully integrate with the wider green infrastructure and open space networks including...Wormwood Scrubs. See suggestions for 3.67 3.67 Could provide a clearer intention of what the Urban Greening corridors on Fig 3.13 are. They should be areas that maximise green infrastructure. Provide an appropriate buffer between the public realm and natural habitats. Provide protection and interpretation of the scrubs. Provide improved connections to other areas.
119	870	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		SP8		Fig 3.13 Add Green Corridors to southern boundary of the scrubs. As shown on the walking and cycling maps
50.b	1012	Statutory Consultee	Donatella	Cillo	Environmental Agency		SP8		It is our view, however that with the production of detailed development guidance, such as the Old Oak North Development Framework for example, you have delved deeper into the traditional grey infrastructure requirements than you have into environmental and Green Infrastructure (GI). A strategic approach to Sustainable urban Drainage Systems (SuDS), water management and Green Infrastructure (GI) is necessary and key to achieving the Mayor's aspiration of good growth. Without a strategic approach to the environment there is a risk that site specific plots will come forward for development from the masterplan and a piecemeal and potentially incoherent approach to GI and SuDS will be the result. Achieving the required urban greening score identified in the London Plan and in Policy EU2 of your local plan for major sites is also likely to be difficult without an overarching GI strategy. We are concerned that a site by site approach is unlikely to provide the necessary multiple environmental benefits which are required to truly achieve good growth throughout OPDC and in Old Oak North.
50.b	1013	Statutory Consultee	Donatella	Cillo	Environmental Agency		SP8		This is particularly important when considering the proposed density of development. High density development will increase the strain on new and existing natural assets. This means that all GI will have to work harder to provide their respective functions as the population increases and as we experience more impacts of climate change. We encourage you to take a natural capital accounting approach to OPDC as promoted in the London Plan, London Environment Strategy and A Greener Future: The Governments 25 Environment Plan. This will allow investment in OPDC to be informed by the range of environmental goods and services that will be required to support development and population living and working here now and in the future.
56	1148	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		SP8		A cross reference to Policy EU3 would be helpful in the supporting text for this policy. Include reference to Policy EU3 Water
110.b	1569	Community Group	Robin	Brown	Grand Union Alliance		SP8		Wormwood Scrubs Park is a historic city and local asset, yet drastically isolated from much of the population and in a forlorn condition. When viewing both the quality and accessibility of parks throughout London it comes as a surprise to find this park is in need of better care and attention. Furthermore, it could link to the Little Wormwood Scrubs Park, canal, cemeteries, etc. Parks, walkways, play, open space, recreation, sport, these are what make London great. And integrated landscape design serving the entire area and its people, including carefully designed areas for young, youths, and older citizens, should be a hallmark of the development of the area, while also tying back into adjacent neighbourhoods.

Policy SP9: Built Environment

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
204	20	Local Resident	Anita	Ringsell			SP9		It is not necessary to build so many high rise tower blocks in this area because the Government has allowed so many people to come here and cannot cope with their social and housing needs. There are many buildings standing empty in London that should be used to house people. Also some of the green belt land owned by rich Lords and Earls should be allowed to be built on. Instead of that you want to make dense living with high buildings in a small area which is already highly polluted with no green spaces or clean air to breath. It makes no sense and you have created a two-tier society. The rich landowners have everything and the people living in poorer areas have to put up with more crowding, lack of health and ridiculous plans imposed on us by the Lord Mayor's Plan for London.
42	191	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	SP9		We consider that the requirement for 30% of the developable land in Old Oak North to be public open space will be a considerable challenge, especially given the requirement to deliver two 2ha local parks, and achieve the development quantum required to deliver a viable development on the site. OPDC, through its work with AECOM, has not yet demonstrated that this level of provision is achievable alongside meeting the homes and jobs targets for OON, and as such we object to the inclusion of this requirement.
16	246	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		SP9	Para 3.80	1.1 We note the omission from 3.80 of the following which appeared in its equivalent (3.95) in the last Plan: "Any proposal for a tall building would need to accord with the requirements of OPDC's tall buildings policy (PolicyD5). Proposals would also need to assess their impact on key views identified in OPDC's Views Study, as required by Policy D7 (Key Views)" (our emphasis) We are particularly concerned at the absence of the second sentence for which we can find no explanation in Tracked Changes. We seek the reinstatement of both sentences so that POLICY SP9 is justified.
17.b	269	Strategic Partner	Debbie	Fifer	Canal & River Trust		SP9		We note and generally welcome the clarification provided in respect of definition and proposed location of tall buildings. More detailed comments are provided in respect of Policy P3 in terms of the Trusts concerns about the potential impact of tall buildings on our waterway.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
115	294	Local Resident	Nye	Jones			SP9		Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
115	297	Local Resident	Nye	Jones			SP9	ii)	Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development
210	304	Local Resident	Gail	Dobinson			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
210	307	Local Resident	Gail	Dobinson			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
212	316	Local Resident	Natasha	Salkey			SP9		Policy SP2 introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
213	322	Local Resident	Rachel	Ritfeld			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
213	325	Local Resident	Rachel	Ritfeld			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
213	332	Local Resident	Rachel	Ritfeld			SP9		TITRA notes that the draft Local Plan 19.2 is consistently vague and evasive over the housing densities that its targets would require. It does not at any point provide a clear list of development sites and required housing densities to deliver its targets. Local Plan Policy SP2 says that the proposals must: "support the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities" but the plan doesn't clearly define what these densities are. It should do so.
213	333	Local Resident	Rachel	Ritfeld			SP9		The plan states that "Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare' but the draft plan's glossary (which isn't in the main body of the plan) then offers a range of densities: Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare High - Stations and key destinations: in the region of 550 units per hectare Medium - Residential led areas: in the region of 405 units per hectare Lower - Sensitive edges: in the region of 300 units per hectare. This suggested range doesn't follow the existing London Plan's Density Matrix for dense development within 800m of an international or major town centre sets out a range of only 215-405 housing units per hectare, and the Local Plan exceeds this. As a result, the Local Plan 19.2 doesn't follow the Mayor's own guidance and it is moving the goalposts towards higher housing densities without owning up to it.
213	334	Local Resident	Rachel	Ritfeld			SP9		Independent academic review of OPDC 2017 Plan targets The Cambridge / Berkeley University review of the 2017 plan highlighted the plan's excessive density and its failure to put this greater density, and its implications for local areas, into a clear context. The universities' study concluded that the 2017 plan targets require: "an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London. The proposed densities would result in every block having a high-rise tower."
213	335	Local Resident	Rachel	Ritfeld			SP9		TITRA believes that Policy SP2 is not sound and it is potentially very harmful to existing communities and local infrastructure unless there is transparent discussion of the Local Plan's intended densities and their implication for existing residential areas.
213	340	Local Resident	Rachel	Ritfeld			SP9	ii)	Policy SP9 ii) says that the plan will "respond appropriately to the setting of sensitive locations identified in figure 3.14, including designated and undesignated heritage assets, open spaces and existing residential communities and ensuring that these help shape local character and townscape." We still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens, with figure 3.14 still listing these areas as being completely surrounded by SIL development. Policy SP9 ii) is unsound and inadequate for the needs of these areas as the zone is so densely redeveloped.
214	346	Local Resident	Ciara	Solmi			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
214	349	Local Resident	Ciara	Solmi			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
91	355	Local Resident	Bruce	Stevenson			SP9		I understand the intended plan exceeds London Plan guidance.
94	360	Local Resident	Oonagh	Heron			SP9	ii)	I would like to see firm plans (Policy SP9 ii) and P8) to protect the conservation area in which I live and thus protect the local heritage, character and strong community that I value so much. I'm really proud of the use of our area in so much filming and the popularity of local filming site tours.
32	384	Local Resident	Bernie	Timmins			SP9		I object to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
32	387	Local Resident	Bernie	Timmins			SP9	ii)	I believe that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
113	392	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP9		Along with the main issue of the frighteningly unrealistic number of new homes, I would also like to highlight that I am totally against any high rise buildings which will block out the view across London from my flat on Wells House Road, I request you keep a good distance from the houses on our road when it comes to new buildings, and ensure the area on the other side of Old Oak Common Lane that runs alongside Wells House Road is made green space with no buildings above ground.
113	396	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP9		3.2 We are particularly concerned at the omission of building heights, albeit 3D models, presentation images, and conversations with OPDC staff and board members point at the ambition of building heights being upwards of 40 storeys. We do not believe that these heights are justified in this area. It particular, we are concerned about the impact on the quality of life if the area around the HS2 Old Oak Common station includes towers of this type of height. Wells House Road residents ask for justification of why building heights are necessary so close to existing homes when they will impact negatively on quality of life: including blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. We should remind you that HS2 and OPDC has described the Old Oak Common area as 'deprived'. We would therefore ask OPDC to justify further deprivation of our community via the vastly negative impacts of high rise tower blocks.
113	400	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP9		3.5 This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this small request is being ignored
113	402	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP9		In addition, if tower blocks cannot be avoided, building higher on the Car Giant land instead of Old Oak Common would have less impact on all existing communities.
113	404	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP9		We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the dire quality of the bland Oaklands development, which was objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, building materials that reflect the Victorian, Edwardian and industrial heritage of the area and to include green space and green walls.
113	415	Local Resident	Thomas	Dyton	WHRRRA (Member)		SP9		We would also like to further protect our community by making Wells House Road a conservation area and to be listed as one of the community assets. In fact, the entire shrunken area OPDC proposes as the designated neighbourhood forum, would be best served as a conservation area.
92.b	427	Community Group	Melanie	Whitlock	The Hammersmith Society		SP9		5 We would like to see the OPDC area become a thriving area of lifetime communities and successful commercial businesses, where people want to live, work, or visit. It is one of the last major areas in London where urban renewal can be undertaken on such a scale, and we would like to see that opportunity be successful. However, as we have said in our previous responses, the extreme and excessive housing densities required by the target of 24,000 new homes mean that the overall development will be neither sustainable nor successful.
92.b	429	Community Group	Melanie	Whitlock	The Hammersmith Society		SP9		7 There are many references to building at high densities (eg SP9 b) but these densities are not set out in the Draft. The current London Plan density matrix has the range 215-405 units/ha for Central Areas. The 19.1 Draft suggested (in the Glossary) a range of up to 600 units/ha. In this Draft, SP9 para 4.35 of supporting text states: Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare. (Our emphasis) 8 Not only is this claimed average proposed density substantially in excess of what is currently considered acceptable in London, the density when land used for commercial, green space, roads etc are excluded increases further. Old Oak Neighbourhood Forum quotes the Cambridge University and Berkeley University study in 2017: The target of 24,000 dwellings together with the 15 million sq ft of commercial space needed for 55,000 jobs will result in net residential densities higher than anything ever built in London. The team measured the gross site area and then calculated the net residential area after excluding land for the transit-hub and land for commercial space, open space and other uses. The net result was that an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London (our emphasis). The proposed densities would result in every block having a high-rise tower. The team demonstrated the implications of such high densities in terms of sunlight access on streets and blocks as well as the impact on the surrounding neighbourhoods. They recommended a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance. 9 Densities such as these are extremely new in London. The effectiveness of making successful and sustainable communities at these densities have not yet been tested: this is not positive planning. The density levels required by the 24,000 target are not clearly set out for the public in this Draft Plan. On such an important matter the Plan must be transparent. For these reasons we consider the target of 24,000 units to be unsound, not positively planned, and unjustified.
92.b	431	Community Group	Melanie	Whitlock	The Hammersmith Society		SP9		12 The Draft Plan uses transport accessibility to justify tall buildings and ultra high densities. We and others have pointed out in the past that Hythe Road Station is not assured, and with the long delay on developing Old Oak South land we understand TfL sees no convincing need to bring forward Hythe Road in the lifetime of the plan. Quoted ptals are therefore misleading. The density and height policies are not justified by the claims for transport accessibility and are therefore not justified and not positively planned.
92.b	435	Community Group	Melanie	Whitlock	The Hammersmith Society		SP9		Policy SP9 Built Environment, supporting text 4.29, Add to list "heritage canalside warehouses at 44 Hythe Road" as above.

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219	443	Local Resident	Jane	Dreaper			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site. THIS IS NOT THE SORT OF TONE OPDC SHOULD BE SETTING - WHERE IS THE OPEN COMMUNITY CONSULTATION? WE EXPECT HIGHER STANDARDS FROM YOU ON MATTERS OF SUCH SIGNIFICANCE.
219	446	Local Resident	Jane	Dreaper			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development. WE NEED PROPER PROTECTION FOR THE OLD OAK CONSERVATION AREA WHICH HAS BEEN SADLY LACKING. WE WOULD LIKE TO HAVE CONFIDENCE IN YOU RATHER THAN A LACK OF TRUST.
220	452	Local Resident	M.	Szoke			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
220	455	Local Resident	M.	Szoke			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
221	461	Local Resident	James	Trew			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
221	464	Local Resident	James	Trew			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
221	471	Local Resident	James	Trew			SP9		TITRA notes that the draft Local Plan 19.2 is consistently vague and evasive over the housing densities that its targets would require. It does not at any point provide a clear list of development sites and required housing densities to deliver its targets. Local Plan Policy SP2 says that the proposals must: "support the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities" but the plan doesn't clearly define what these densities are. It should do so.
221	472	Local Resident	James	Trew			SP9		The plan states that "Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare' but the draft plan's glossary (which isn't in the main body of the plan) then offers a range of densities: Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare High - Stations and key destinations: in the region of 550 units per hectare Medium - Residential led areas: in the region of 405 units per hectare Lower - Sensitive edges: in the region of 300 units per hectare. This suggested range doesn't follow the existing London Plan's Density Matrix for dense development within 800m of an international or major town centre sets out a range of only 215-405 housing units per hectare, and the Local Plan exceeds this. As a result, the Local Plan 19.2 doesn't follow the Mayor's own guidance and it is moving the goalposts towards higher housing densities without owning up to it.
221	473	Local Resident	James	Trew			SP9		Independent academic review of OPDC 2017 Plan targets The Cambridge / Berkeley University review of the 2017 plan highlighted the plan's excessive density and its failure to put this greater density, and its implications for local areas, into a clear context. The universities' study concluded that the 2017 plan targets require: "an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London. The proposed densities would result in every block having a high-rise tower."
221	474	Local Resident	James	Trew			SP9		TITRA believes that Policy SP2 is not sound and it is potentially very harmful to existing communities and local infrastructure unless there is transparent discussion of the Local Plan's intended densities and their implication for existing residential areas.
221	479	Local Resident	James	Trew			SP9	ii)	Policy SP9 ii) says that the plan will "respond appropriately to the setting of sensitive locations identified in figure 3.14, including designated and undesignated heritage assets, open spaces and existing residential communities and ensuring that these help shape local character and townscape." We still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens, with figure 3.14 still listing these areas as being completely surrounded by SIL development. Policy SP9 ii) is unsound and inadequate for the needs of these areas as the zone is so densely redeveloped.
222	486	Local Resident	Stephanie	Hewett			SP9		There is no clear indication of how high these buildings will be and exactly where so we don't know how they will affect our skyline and our light. The fact that this is so vague in the proposal is of great concern and feels very "shifty".
93	513	Residents Association			Wells House Road Residents Association		SP9		3.2 We are particularly concerned at the omission of building heights, albeit 3D models, presentation images, and conversations with OPDC staff and board members point at the ambition of building heights being upwards of 40 storeys. We do not believe that these heights are justified in this area. In particular, we are concerned about the impact on the quality of life if the area around the HS2 Old Oak Common station includes towers of this type of height. Wells House Road residents ask for justification of why building heights are necessary so close to existing homes when they will impact negatively on quality of life: including blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. We should remind you that HS2 and OPDC has described the Old Oak Common area as 'deprived'. We would therefore ask OPDC to justify further deprivation of our community via the vastly negative impacts of high rise tower blocks.
93	516	Residents Association			Wells House Road Residents Association		SP9		We are most concerned with the ambitions for high-density high rise development close to existing communities – particularly around the HS2 Old Oak Common Station and also to the west of Wells House Road. Over development and the building of tower blocks close to two storey communities will negatively impact on the quality of life of the residents in existing Old Oak communities; Wells House Road, Midland Terrace, Shaftesbury Gardens, Titra and Wesley Estate.

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93	518	Residents Association			Wells House Road Residents Association		SP9		In addition, OPDC should ensure that new transport hubs are sensitively designed to fit with existing architectural style and to ensure that they do not increase the level of noise, light or air pollution. 3.5 This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this small request is being ignored
93	520	Residents Association			Wells House Road Residents Association		SP9		In addition, if tower blocks cannot be avoided, building higher on the Car Giant land instead of Old Oak Common would have less impact on all existing communities.
93	522	Residents Association			Wells House Road Residents Association		SP9		We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the dire quality of the bland Oaklands development, which was objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, building materials that reflect the Victorian, Edwardian and industrial heritage of the area and to include green space and green walls.
93	533	Residents Association			Wells House Road Residents Association		SP9		We would also like to further protect our community by making Wells House Road a conservation area and to be listed as one of the community assets. In fact, the entire shrunken area OPDC proposes as the designated neighbourhood forum, would be best served as a conservation area.
223	547	Local Resident	Eileen	Hannington			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
223	550	Local Resident	Eileen	Hannington			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
223	557	Local Resident	Eileen	Hannington			SP9		TITRA notes that the draft Local Plan 19.2 is consistently vague and evasive over the housing densities that its targets would require. It does not at any point provide a clear list of development sites and required housing densities to deliver its targets. Local Plan Policy SP2 says that the proposals must: "support the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities" but the plan doesn't clearly define what these densities are. It should do so.
223	558	Local Resident	Eileen	Hannington			SP9		The plan states that "Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare' but the draft plan's glossary (which isn't in the main body of the plan) then offers a range of densities: Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare High - Stations and key destinations: in the region of 550 units per hectare Medium - Residential led areas: in the region of 405 units per hectare Lower - Sensitive edges: in the region of 300 units per hectare. This suggested range doesn't follow the existing London Plan's Density Matrix for dense development within 800m of an international or major town centre sets out a range of only 215-405 housing units per hectare, and the Local Plan exceeds this. As a result, the Local Plan 19.2 doesn't follow the Mayor's own guidance and it is moving the goalposts towards higher housing densities without owning up to it.
223	559	Local Resident	Eileen	Hannington			SP9		Independent academic review of OPDC 2017 Plan targets The Cambridge / Berkeley University review of the 2017 plan highlighted the plan's excessive density and its failure to put this greater density, and its implications for local areas, into a clear context. The universities' study concluded that the 2017 plan targets require: "an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London. The proposed densities would result in every block having a high-rise tower."
223	560	Local Resident	Eileen	Hannington			SP9		TITRA believes that Policy SP2 is not sound and it is potentially very harmful to existing communities and local infrastructure unless there is transparent discussion of the Local Plan's intended densities and their implication for existing residential areas.
223	565	Local Resident	Eileen	Hannington			SP9	ii)	Policy SP9 ii) says that the plan will "respond appropriately to the setting of sensitive locations identified in figure 3.14, including designated and undesignated heritage assets, open spaces and existing residential communities and ensuring that these help shape local character and townscape." We still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens, with figure 3.14 still listing these areas as being completely surrounded by SIL development. Policy SP9 ii) is unsound and inadequate for the needs of these areas as the zone is so densely redeveloped.
47	581	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		SP9	3.73	SP9 para 3.73 and 3.74 Figure 3.15: Sensitive Locations. There should also be reference to Kensal Green Cemetery being a Grade 1 Listed Registered Park and Garden. Key Views should include the view from the Round Pond in Kensington Gardens.
225	632	Local Resident	Marta	Donaghey			SP9		I object to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
225	635	Local Resident	Marta	Donaghey			SP9	ii)	I believe that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.

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9.b	639	Statutory Consultee	Katie	Parsons	Historic England		SP9		<p>A major change in this draft of the Plan is in Figure 3.15 which now shows specific locations where tall buildings would be an appropriate form of development in principle. We also note that the Plan's definition of a tall building has changed; it is now taken to mean a building of 15 storeys or a minimum of 48m from ground level.</p> <p>With regards to the definition, we would encourage you to consider a contextual approach to a definition as advocated by part A of draft London Plan policy D8 (Tall Buildings). We note that additional evidence in the form of a Tall Buildings Statement has been produced to support the revised Plan and the new definition. The approach taken in the study is heavily influenced by the draft London Plan's stance on tall buildings and the methodology therein.</p> <p>Historic England raised a number of points in response to the draft London Plan which will also be pertinent here, crucially the need for boroughs to identify different heights depending on the varied character of different areas. The Tall Buildings study cross-references other studies but the conclusions drawn appear to be mainly based on precedent rather than characterisation or modelling work. We have suggested that the London Plan is amended to clarify what it means by a definition of tall buildings and have requested that the policy refers to the need for characterisation to inform buildings heights.</p>
25	656	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	SP9	Figure 3.15	We welcome the inclusion of Figure 3.15 and the clarity it brings regarding the potential location of tall buildings.
25	657	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	SP9	Figure 3.15	It is considered that the redevelopment of Boden House and surrounding land would result in a site suitable for a tall building. It is within a 'Major Town Centre' (Figure 2.2.). It will be an intersection point on the corner of a key route between North Acton and Old Oak Common Lane stations. It is located adjacent to the Central Line and in close proximity to North Acton station. The site is some distance from sensitive areas or heritage buildings. We consider that the Boden House site could be considered for a 'star' to identify it as a 'specific location' for a tall building.
227	681	Local Resident	Jamie	Sutcliffe			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
227	684	Local Resident	Jamie	Sutcliffe			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
28	710	Strategic Partner	Lucinda	Turner	Transport for London		SP9	Figure 3.15	TfL requests that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period. This comment is also relevant to a number of other figures in the document e.g. Figure 3.7, 3.15, 10.3
107	879	Residents Association	Mark	Walker	TITRA		SP9		TITRA objects to Policy SP2 because it is seeking to introduce densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a format which allows a read-across with other chapters – which is unfair in a public consultation document. There must be a transparent public discussion of intended housing densities site by site because they affect local infrastructure and existing communities.
107	882	Residents Association	Mark	Walker	TITRA		SP9	ii)	TITRA believes that Policy SP9 ii) is unsound: we still do not see an adequate vision in the plan's strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development. There should be clear provision for buffer zones around these residential areas.
107	891	Residents Association	Mark	Walker	TITRA		SP9		TITRA notes that the draft Local Plan 19.2 is consistently vague and evasive over the housing densities that its targets would require. It does not at any point provide a clear list of development sites and required housing densities to deliver its targets. Local Plan Policy SP2 says that the proposals must: "support the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities" but the plan doesn't clearly define what these densities are. It should do so.
107	892	Residents Association	Mark	Walker	TITRA		SP9		<p>The plan states that "Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare' but the draft plan's glossary (which isn't in the main body of the plan) then offers a range of densities:</p> <p>Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare High - Stations and key destinations: in the region of 550 units per hectare Medium - Residential led areas: in the region of 405 units per hectare Lower - Sensitive edges: in the region of 300 units per hectare.</p> <p>This suggested range doesn't follow the existing London Plan's Density Matrix for dense development within 800m of an international or major town centre sets out a range of only 215-405 housing units per hectare, and the Local Plan exceeds this. As a result, the Local Plan 19.2 doesn't follow the Mayor's own guidance and it is moving the goalposts towards higher housing densities without owning up to it.</p>
107	893	Residents Association	Mark	Walker	TITRA		SP9		<p>Independent academic review of OPDC 2017 Plan targets</p> <p>The Cambridge / Berkeley University review of the 2017 plan highlighted the plan's excessive density and its failure to put this greater density, and its implications for local areas, into a clear context. The universities' study concluded that the 2017 plan targets require: "an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London. The proposed densities would result in every block having a high-rise tower."</p>
107	894	Residents Association	Mark	Walker	TITRA		SP9		TITRA believes that Policy SP2 is not sound and it is potentially very harmful to existing communities and local infrastructure unless there is transparent discussion of the Local Plan's intended densities and their implication for existing residential areas.

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107	899	Residents Association	Mark	Walker	TITRA		SP9	ii)	Policy SP9 ii) says that the plan will “respond appropriately to the setting of sensitive locations identified in figure 3.14, including designated and undesignated heritage assets, open spaces and existing residential communities and ensuring that these help shape local character and townscape.” We still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens, with figure 3.14 still listing these areas as being completely surrounded by SIL development. Policy SP9 ii) is unsound and inadequate for the needs of these areas as the zone is so densely redeveloped.
228	908	Local Resident	Pablo	Navarrete			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
228	911	Local Resident	Pablo	Navarrete			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
114	919	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		2.2. We object to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities for each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There is no transparent public discussion of intended housing densities site by site.
114	922	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		2.5 We believe that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting the Old Oak Conservation Area, Wells House Road or Midland Terrace/Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development. Particularly disturbing is the siting of a v tall building on the site of Midland Gate in-between Midland Terrace and Wells House Road. This site is to the south of Midland Terrace and as such will cause immediate lack of light among other disturbances.
114	933	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: • The extreme and excessive housing densities, leading (as supporting studies acknowledge) to a new and unprecedented building typology for London which was not part of the 2013 Vision for Old Oak and which has been strongly opposed by local people in subsequent consultation responses at Regulation 18 and 19.1 stage.
114	941	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		6.1 There is no specific policy within the 19.2 OPDC Draft Local Plan that identifies a range of appropriate housing densities, either for the whole Old Oak area or for different 'Places' within it. Despite this lack of any justified overall policy, the Plan is in practice very prescriptive on this issue, through the use of site allocations and minimum housing targets for each site.
114	942	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		6.2 The intention to build at 'high densities' is referred to in numerous policies and sections of supporting text but density levels are not the subject of further clarification or definition. The glossary to the document (which presumably carries little or no policy weight) states Within the OPDC area the indicative density range is 300 (low density) to 600 (high density) units per hectare. 6.3 Within the current London Plan Density Matrix, the density range for development within 'central' areas (areas with very dense development located within 800m of an international or major town centre) is 215-405 housing units/hectare. Hence the Local Plan has from Reg 18 stage onwards set new definitions of 'high density' above those in the London Plan. This is neither justified nor explained to the public, albeit that 'intensification' in Opportunity Area has become standards across London.
114	943	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		6.4 The transition in the way questions of housing density are approached, in the 2015 OAPF and the two subsequent versions of the Local Plan, demonstrates that: • Increasingly high housing densities have been deemed acceptable in successive documents, with no clear policy rationale for this change from one document to the next. • The OPDC is reluctant to make clear to the public the resultant implications, for building heights and typologies. The NPPG requires Local Plans to be 'clear' and 'accessible as possible' to the public (Paragraph: 010 Reference ID: 12-010-20140306). The OPDC Draft Local Plan appears to remain deliberately opaque on the questions of density and building heights despite many previous consultation responses seeking greater transparency.

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114	944	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		<p>7.1 The 2015 OAPF document included specific 'Principles' D3 and 004 on Building Heights and Density. These set out how density and building height should be approached at different locations, with heights increasing from 'sensitive edges' to the maximum densities at the central rail interchange. An accompanying map at Figure 45 showed areas and locations at which these densities were likely to occur, with a table showing what was meant by 'higher', 'average' and 'lower' densities (using the OPDC's own definitions of these terms rather than that of the London Plan).</p> <p>7.2 The Regulation 18 Draft Local Plan took these 'high density' principles a step further. Policy OSP4 on Densities and Building Heights set out a 'preferred policy on' on densities for different parts of the plan area. Density ranges were again defined in the supporting text (at higher levels than those shown in the previous OAPF) and extending to a 'highest' density of 600 units per hectare at 'Old Oak Common Station and surrounds'. Again, a map was provided at Figure 18, showing the areas to which, these density ranges were expected to apply.</p> <p>7.3 Consultation responses to the Regulation 18 Draft, from this Group and other amenity, community groups, drew attention to the fact that these density ranges were significantly above the London Plan Density Matrix and were what many professional and academic bodies viewed as 'super densities' or 'hyper-densities'. The term 'ultra-density' has been used recently in relation to plans for the Isle of Dogs.</p> <p>7.4 The Regulation 19.1 Draft Local Plan took a new tack. Draft Policy SP2 on Good Growth was a new draft, designed to support 'transit oriented high-density development'. This policy required proposals to support development 'at appropriately high densities', with no supporting definition of density ranges. Draft Policy SP9 on Built Environment required development 'that delivers high densities and a range of building heights including tall buildings i) in the places and/or clusters policies and/or ii) in areas where there high levels of existing or planned public transport accessibility. This policy was accompanied by no definition of what constitutes a 'tall building'.</p> <p>7.5 Unlike the Regulation 18 version, the 19.1 Draft Plan provided no map of the OPDC area showing where different density ranges were likely to apply. Nor was there any definition within the text of the Plan, either in policies or the supporting commentary of what was meant by 'high density'.</p> <p>7.6 The Glossary to the document provided similar information to that in the Regulation 18 Glossary, with an interesting additional note. The updated entry under 'Density' read as below: Provided to interpret the London Plan sustainable residential quality density matrix for the Old Oak and Park Royal local context. The density ranges are: <ul style="list-style-type: none"> • Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare; (one in Midland Gate at the end of Midland Terrace) • High - Stations and key destinations: in the region of 550 units per hectare; • Medium - Residential led areas: in the region of 405 units per hectare; and • Lower - Sensitive edges: in the region of 300 units per hectare. (This entry in the Glossary does not explain how these ranges 'interpret' the London Plan Matrix. These are a wholly different (and significantly higher) set of ranges and densities than those in the London Plan.)</p> <p>7.7 In the Regulation 19.1 Draft, no separate policy on densities and building heights reappears. Policy SP9 on 'Built Environment' leaves the public having to read through the individual Place chapters to gain some insight as to where 'places and/or clusters policies' might have effect. The concept of a 'cluster' appears to have been introduced to the Plan (via a Scrubs Lane Development Framework Principles document) as a means of retro-fitting policy round a series of sites in Scrubs Lane where landowners/ developers came forward with applications for tall residential towers. The term 'appropriately high densities' used in Policy SP9 is largely meaningless when no associated strategic policies or density ranges are included in the Plan.</p> <p>7.8 Consultation responses on the Regulation 19.1 version from this Forum, the Hammersmith Society, and from the Old Oak Neighbourhood Forum flagged up these issues. The Regulation 19.2 version makes only very limited attempts to address these responses.</p> <p>7.9 A new sentence is added at paragraph 1.79 of the 19.2 version reading 'Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare'. This is a brief but key additional to the Local Plan, and is not enshrined in any policy. No contextual information is provided, to enable the public to understand the implications of this statement. A proposal that Old Oak should be achieved by building out housing across the entire area at an average density well above the London Plan density guidance for central area locations with the highest possible public transport accessibility, is surely a matter of public interest and note? In our view, it is one that requires much more justification than a single inserted sentence.</p>
114	945	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9	3.80	<p>8. The previous criticisms that the 19.1 Draft included no definition of a 'tall building' has been met in the 19.2 version with another additional sentence at paragraph 1.80 reading 'Tall buildings are defined in OPDC's evidence base as buildings providing 15 or more residential storeys or being above 48 metres above ground level'. The Mayor of London currently uses 30m as a trigger for Stage 1 referral.</p> <p>8.1 Again, this new paragraph gives little indication to the average member of the public of the reality of future building heights at Old Oak, should the current Draft Local Plan be adopted and applied.</p>

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114	946	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		8.2 Modelling of the OPDC Local Plan proposals was undertaken during a Cambridge University and Berkeley University study, in 2017. The issue of density was one of four key themes examined. The report from the project concluded: The target of 24,000 dwellings together with the 15 million sq of commercial space needed for 55,000 jobs will result in net residential densities higher than anything ever built in London. The team measured the gross site area and then calculated the net residential area after excluding land for the transit-hub and land for commercial space, open space and other uses. The net result was that an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London (our emphasis). The proposed densities would result in every block having a high-rise tower. The team demonstrated the implications of such high densities in terms of sunlight access on streets and blocks as well as the impact on the surrounding neighbourhoods. They recommended a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance. 8.3 The jobs target for the OPDC area has been reduced significantly between the 19.1. and 19.2 Local Plans, but this does not fully explain why the Cambridge/Berkeley modelling should arrive at an average housing density of 550 units/hectare as compared with the OPDC's figure of 450. 8.4 A straightforward way for this question to be answered (and for the public to better understand the implications of the OPDC Local Plan) would be for the Site Allocations table at Table 3.1 of the latest draft to include a column showing anticipated densities for each site. The size of each of these sites is known to the OPDC. The OPDC has itself set minimum housing targets for each. Density figures would be simple to add, and were requested in responses from local groups to the 19.1 consultation. These figures have not been provided.
114	947	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		8.5 Overall the 19.2 Draft Plan opaque on the densities and building heights that will result at Old Oak were its policies to be adopted and applied. The public are required to read closely other supporting studies, and the 'Place' chapters of the Plan, to gain any understanding of the likely built form of what is due to become a significant addition to the city.
114	949	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		9.2 At a series of OPDC public consultation meetings on the Regula on 18 and 19 drafts, questions on building heights have been met by OPDC planning officers with bland assurances that each planning application will each be judged on its merits. There has been no acknowledgement that Old Oak is destined to see the emergence of a 'new typology' of built form, with clusters of towers that may well exceed in number and proximity those being built in parts of east London and at Vauxhall/Nine Elms/ Battersea.
114	950	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		9.3 Why should the public have any confidence that the OPDC 19.2 Draft Local Plan has reached the right conclusions in terms of development capacity at Old Oak — as compared with proposals for the area put together by LBHF in the preparation of its own Local plan back in 2013-15, or in the joint GLA and Borough work that led up to the 2013 Vision for Old Oak and Park Royal? 9.4 This group supports the view of the StQW Forum, supported by evidence from the work of the Cambridge/Berkeley study and more recent analysis by teams from the University of Texas School of Architecture2, is that the Old Oak area will not support sustainable development of more than 16,000—19,000 new homes. Above this figure, averaged housing densities and resultant building heights will depart from anything seen hitherto in London, when extended across a large regeneration area. The last opportunity to create an exemplary part of London where people genuinely wish to live, work and play will have been lost.
114	951	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		10.1 Draft OPDC Policy D9 on Tall Buildings states Proposals for tall buildings will be supported as an appropriate form of development in principle where they: a) accord with latest relevant national guidance, London Plan policies, policy SP9 and relevant policies within the Places Chapter..... This sets no clear parameters, and offers no clarity to the public, in relation to building heights that will be deemed acceptable on the basis of achieving site allocation targets set at Table 3.1 of the Draft Local Plan.
114	970	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		Extreme and excessive housing densities (NFFP Criterion not met) Proposed densities have increased from a range of 300-600 in Reg 18 Draft Plan to an average of 600 as per the Old Oak North Development Framework Principles. No adequate evidence base for this change. No justification as to why Old Oak should be developed with a 'new London typology' in terms of built form and building heights. Not positively planned, leading to unsustainable development. Density maps in OAPF and Reg 18 Draft removed from 19.1 and 19.2 Draft. This is contrary to NPPF requirements that Local Plans should be 'clear'.
114	971	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		Tall buildings policies which are unclear, opaque and non-transparent to the public as well as contrary to the London Plan. (NFFP Criterion not met) The Tall Buildings Statement is inadequate as supporting evidence to the 19.2 Draft Plan. It provides no clarity to developers or the public as to anticipated building heights or what might prove acceptable/unacceptable (contrary to NPPF 154). It avoids all men on of any building height above the OPDC definition of 15 storeys. Policy SP9 on Built Environment and Policy D5 on Tall Buildings claim that 'appropriate' building heights will need to conform with London Plan policies, while relying on additional 'Place' policies and site allocations to circumvent the London Plan at Old Oak North and Scrubs Lane.
114	984	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		SP9		16.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority • publishing a 19.2 Dra Plan and Supporting Studies which are deliberately opaque on issues of housing density and resultant building heights, to the point of being dishonest with the public.
95	989	Local Resident	Mark	Walker			SP9		I object strongly to Policy SP2 because it is seeking to introduce densities above existing London Plan guidance. Everyone – including residents need to see your calculations in the open.
231	1086	Local Resident	Eric	Leach			SP9		I object to these plans primarily on the basis of housing densities. The average net density of over 550 dwellings per hectare is way above current planning guidelines. Sir Peter Hall's vision for this area was the opportunity to create a brand new community here with homes, shops, open spaces, care facilities, work places, sports, cultural and leisure facilities along with great new underground and overground transport facilities. What is being thrown together here is primarily lots of residential tower blocks.

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101	1098	Local Resident	Jason	Salkely			SP9		I object to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
101	1101	Local Resident	Jason	Salkely			SP9	ii)	I object to Policy SP9 ii) which is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
56	1114	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		SP9	Figure 3.15	Identifies (within Old Oak North and South) 4 locations in Scrubs Lane as "Specific locations where tall buildings are an appropriate form of development in principle". The map should either mark all areas where tall buildings would be acceptable (e.g. the one already approved on Old Oak South), or not mark specific tall building locations at all. It is not clear for the general public as to why these locations are considered to be acceptable given their close proximity to sensitive locations.
56	1115	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		SP9	Para 3.71	"Design quality covers a broad range of uses and can be subjective, in particular in respect of architectural treatment and building height." This is unclear. Amend Para 3.71 as follows:- "High design quality is sought for a broad range of building typologies, and can be subjective....."
234	1297	Local Resident	Elaine	Gristock			SP9		Policy SP2 is introducing densities above our existing London Plan guidance. Why haven't you offered the individual density calculations for specific sites? Your presentation of this information must be open and honest. Local residents have been given no clear idea of what you're hoping to inflict on them and how your plans might change everyday life.
234	1300	Local Resident	Elaine	Gristock			SP9		Policy SP9 ii) is unsound: still no clear plan for the protection of our Old Oak Conservation Area, Wells House Road, Midland Terrace, Shaftesbury Gardens; we are surrounded by Strategic Industrial Land development and there should be adequate plans for the preservation of the character of these areas.
103	1335	Local Resident	David	Turner			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
103	1338	Local Resident	David	Turner			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
89	1345	Local Resident	Nicky	Guymmer			SP9		TITRA objects to Policy SP2 because it is introducing densities above existing London Plan guidance. The OPDC has clearly made calculations of projections of housing densities each site in the development area but doesn't put them in a public consultation document, which is unfair and dishonest. There must be a transparent public discussion of intended housing densities site by site.
89	1348	Local Resident	Nicky	Guymmer			SP9	ii)	TITRA believes that Policy SP9 ii) is unsound - we still do not see an adequate vision in strategic policies like SP9 for protecting for the Old Oak Conservation Area, Wells House Road or Midland Terrace / Shaftesbury Gardens which are completely surrounded by Strategic Industrial Land) SIL development.
236	1355	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		SP9		The high rise developments and the target of 24,000 dwellings together with 15 million sq ft of commercial space would mean density levels similar to Hong Kong in what is now a vastly reduced area. Due to the CrossRail depot and sidings occupying a vast area. The target figures were never adjusted to accommodate this loss of area.
100	1364	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		SP9		On issues of proposed housing densities, we see nothing in the 19.2 version that justifies the density levels proposed, which are even more extreme than in the 19.1 Draft. We support the views of the Hammersmith Society, St Quintin and Woodlands Neighbourhood Forum, and Wells House Residents Association that these densities lack any substantive evidence base or justification and would introduce to London a set of building typologies which the public find unacceptable and which are damaging to health and quality of life. We consider the relevant OPDC policies to be unsound.
100	1365	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		SP9		We share the widespread concerns that the density levels are premised on assumed future PTAL levels, for which the required public transport infrastructure (including new Overground stations at old Oak Common lane and at Hythe Road) remain very uncertain.
100	1366	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		SP9		We see the developments at North Acton in recent years as examples of 'regeneration' in London at its least successful. A new cluster of towers, with an over-concentration of student housing and 1-2 bed apartments and a dismal and windswept public realm, has raised concerns amongst local people that a similar pattern of 'more of the same' will arrive at Old Oak. The redeveloped area at North Acton lacks basic facilities, has little family housing, and no sense of a real community. The existing transport infrastructure (North Acton Underground) is already overloaded.
100	1367	Neighbourhood Forum	Mark	Walker	Old Oak Interim Neighbourhood Forum		SP9		While decisions on major planning applications at North Acton have been delegated to LB Ealing, the OPDC as planning authority must accept ultimate responsibility for what has emerged at North Acton. This has been part of the OPDC area since April 2015. What has been built gives the public no confidence that a future Old Oak will prove to be a successful and sustainable new part of London.
82	1375	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		2.6 The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: The extreme and excessive housing densities, leading (as supporting studies acknowledge) to a new and unprecedented building typology for London which was not part of the 2013 Vision for Old Oak and which has been strongly opposed by local people in subsequent consultation responses at Regulation 18 and 19.1 stage.
82	1383	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		4.1 There is no specific policy within the 19.2 OPDC Draft Local Plan that identifies a range of appropriate housing densities, either for the whole Old Oak area or for different 'Places' within it. Despite this lack of any justified overall policy, the Plan is in practice very prescriptive on this issue, through the use of site allocations and minimum housing targets for each site.

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82	1384	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		4.2 The intention to build at 'high densities' is referred to in numerous policies and sections of supporting text but density levels are not the subject of further clarification or definition. The glossary to the document (which presumably carries little or no policy weight) states Within the OPDC area the indicative density range is 300 (low density) to 600 (high density) units per hectare. 4.2 Within the current London Plan Density Matrix, the density range for development within 'central' areas (areas with very dense development located within 800m of an international or major town centre) is 215-405 housing units/hectare. Hence the Local Plan has from Reg 18 stage onwards set new definitions of 'high density' above those in the London Plan. This is neither justified nor explained to the public, albeit that 'intensification' in Opportunity Area has become standards across London.
82	1385	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		4.3 The transition in the way questions of housing density are approached, in the 2015 OAPF and the two subsequent versions of the Local Plan, demonstrates that: " Increasingly high housing densities have been deemed acceptable in successive documents, with no clear policy rationale for this change from one document to the next. " The OPDC is reluctant to make clear to the public the resultant implications, for building heights and typologies. The NPPG requires Local Plans to be 'clear' and 'accessible as possible' to the public (Paragraph: 010 Reference ID: 12-010-20140306). The OPDC Draft Local Plan appears to remain deliberately opaque on the questions of density and building heights despite many previous consultation responses seeking greater transparency.
82	1386	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		4.4 The 2015 OAPF document included specific 'Principles' D3 and 004 on Building Heights and Density. These set out how density and building height should be approached at different locations, with heights increasing from 'sensitive edges' to the maximum densities at the central rail interchange. An accompanying map at Figure 45 showed areas and locations at which these densities were likely to occur, with a table showing what was meant by 'higher', 'average' and 'lower' densities (using the OPDC's own definitions of these terms rather than that of the London Plan). 4.5 The Regulation 18 Draft Local Plan took these 'high density' principles a step further. Policy OSP4 on Densities and Building Heights set out a 'preferred policy option' on densities for different parts of the plan area. Density ranges were again defined in the supporting text (at higher levels than those shown in the previous OAPF) and extending to a 'highest' density of 600 units per hectare at 'Old Oak Common Station and surrounds'. Again a map was provided at Figure 18, showing the areas to which these density ranges were expected to apply. 4.6 Consultation responses to the Regulation 18 Draft, from this Forum and other amenity societies and community groups, drew attention to the fact that these density ranges were significantly above the London Plan Density Matrix and were what many professional and academic bodies viewed as 'super densities' or 'hyper-densities'. The term 'ultra-density' has been used recently in relation to plans for the Isle of Dogs. 4.7 The Regulation 19.1 Draft Local Plan took a new tack. Draft Policy SP2 on Good Growth was a new draft, designed to support 'transit oriented high density development'. This policy required proposals to support development 'at appropriately high densities', with no supporting definition of density ranges. Draft Policy SP9 on Built Environment required development 'that delivers high densities and a range of building heights including tall buildings i) in the places and/or clusters policies and/or ii) in areas where there high levels of existing or planned public transport accessibility. This policy was accompanied by no definition of what constitutes a 'tall building'. 4.8 Unlike the Regulation 18 version, the 19.1 Draft Plan provided no map of the OPDC area showing where different density ranges were likely to apply. Nor was there any definition within the text of the Plan, either in policies or the supporting commentary of what was meant by 'high density'. 4.9 The Glossary to the document provided similar information to that in the Regulation 18 Glossary, with an interesting additional note. The updated entry under 'Density' read as below: Provided to interpret the London Plan sustainable residential quality density matrix for the Old Oak and Park Royal local context. The density ranges are: • Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare; • High - Stations and key destinations: in the region of 550 units per hectare; • Medium - Residential led areas: in the region of 405 units per hectare; and • Lower - Sensitive edges: in the region of 300 units per hectare. This entry in the Glossary does not explain how these ranges 'interpret' the London Plan Matrix. These are a wholly different (and significantly higher) set of ranges and densities than those in the London Plan. 4.10 In the Regulation 19.1 Draft, no separate policy on densities and building heights reappears. Policy SP9 on 'Built Environment' leaves the public having to read through the individual Place chapters to gain some insight as to where 'places and/or clusters policies' might have effect. The concept of a 'cluster' appears to have been introduced to the Plan (via a Scrubs Lane Development Framework Principles document) as a means of retro-fitting policy round a series of sites in Scrubs Lane where landowners/developers came forward with applications for tall residential towers. The term 'appropriately high densities' used in Policy SP9 is largely meaningless when no associated strategic policies or density ranges are included in the Plan. 4.11 Consultation responses on the Regulation 19.1 version from this Forum, the Hammersmith Society, and from the Old Oak Neighbourhood Forum flagged up these issues. The Regulation 19.2 version makes only very limited attempts to address these responses. 14.12 A new sentence is added at paragraph 1.79 of the 19.2 version reading 'Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare'. This is a brief but key addition to the Local Plan, and is not enshrined in any policy. No contextual information is provided, to enable the public to understand the implications of this statement. A proposal that Old Oak should be achieved by building out housing across the entire area at an average density well above the London Plan density guidance for central area locations with the highest possible public transport accessibility, is surely a matter of public interest and note? In our view, it is one that requires much more justification than a single inserted sentence.
82	1387	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9	3.80	4.13 The previous criticisms that the 19.1 Draft included no definition of a 'tall building' has been met in the 19.2 version with another additional sentence at paragraph 1.80 reading 'Tall buildings are defined in OPDC's evidence base as buildings providing 15 or more residential storeys or being above 48 metres above ground level'. The Mayor of London currently uses 30m as a trigger for Stage 1 referral. 4.14 Again, this new paragraph gives little indication to the average member of the public of the reality of future building heights at Old Oak, should the current Draft Local Plan be adopted and applied.

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82	1388	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>4.15 Modelling of the OPDC Local Plan proposals was undertaken during a Cambridge University and Berkeley University study, in 2017. The issue of density was one of four key themes examined. The report from the project concluded: The target of 24,000 dwellings together with the 15 million sq ft of commercial space needed for 55,000 jobs will result in net residential densities higher than anything ever built in London. The team measured the gross site area and then calculated the net residential area after excluding land for the transit-hub and land for commercial space, open space and other uses. The net result was that an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London (our emphasis). The proposed densities would result in every block having a high-rise tower. The team demonstrated the implications of such high densities in terms of sunlight access on streets and blocks as well as the impact on the surrounding neighborhoods. They recommended a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance.</p> <p>4.16 The jobs target for the OPDC area has been reduced significantly between the 19.1. and 19.2 Local Plans, but this does not fully explain why the Cambridge/Berkeley modelling should arrive at an average housing density of 550 units/hectare as compared with the OPDC's figure of 450.</p> <p>4.17 A straightforward way for this question to be answered (and for the public to better understand the implications of the OPDC Local Plan) would be for the Site Allocations table at Table 3.1 of the latest Draft to include a column showing anticipated densities for each site. The size of each of these sites is known to the OPDC. The OPDC has itself set minimum housing targets for each. Density figures would be simple to add, and were requested in responses from local groups to the 19.1 consultation. These figures have not been provided.</p>
82	1389	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>4.18 Overall the 19.2 Draft Plan opaque on the densities and building heights that will result at Old Oak were its policies to be adopted and applied. The public are required to read closely other supporting studies, and the 'Place' chapters of the Plan, to gain any understanding of the likely built form of what is due to become a significant addition to the city.</p>
82	1391	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>4.26 At a series of OPDC public consultation meetings on the Regulation 18 and 19 drafts, questions on building heights have been met by OPDC planning officers with bland assurances that each planning application will each be judged on its merits. There has been no acknowledgement that Old Oak is destined to see the emergence of a 'new typology' of built form, with clusters of towers that may well exceed in number and proximity those being built in parts of east London and at Vauxhall/Nine Elms/Battersea.</p>
82	1392	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>4.27 Why should the public have any confidence that the OPDC 19.2 Draft Local Plan has reached the right conclusions in terms of development capacity at Old Oak — as compared with proposals for the area put together by LBHF in the preparation of its own Local plan back in 2013-15, or in the joint GLA and Borough work that led up to the 2013 Vision for Old Oak and Park Royal?</p> <p>4.28 The view of the StQW Forum, supported by evidence from the work of the Cambridge/Berkeley study and more recent analysis by teams from the University of Texas School of Architecture², is that the Old Oak area will not support sustainable development of more than 16,000—19,000 new homes. Above this figure, averaged housing densities and resultant building heights will depart from anything seen hitherto in London, when extended across a large regeneration area. The last opportunity to create an exemplary part of London where people genuinely wish to live, work and play will have been lost.</p>
82	1393	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>5.1 Draft OPDC Policy D9 on Tall Buildings states Proposals for tall buildings will be supported as an appropriate form of development in principle where they: a) accord with latest relevant national guidance, London Plan policies, policy SP9 and relevant policies within the Places Chapter..... This sets no clear parameters, and offers no clarity to the public, in relation to building heights that will be deemed acceptable on the basis of achieving site allocation targets set at Table 3.1 of the Draft Local Plan.</p>
82	1412	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>Extreme and excessive housing densities (Paragraph 4 above) Proposed densities have increased from a range of 300-600 in Reg 18 Draft Plan to an average of 600 as per the Old Oak North Development Framework Principles. No adequate evidence base for this change. No justification as to why Old Oak should be developed with a 'new London typology' in terms of built form and building heights. Not positively planned, leading to unsustainable development. Density maps in OAPF and Reg 18 Draft removed from 19.1 and 19.2 Draft. This is contrary to NPPF requirements that Local Plans should be 'clear'.</p>
82	1413	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>Tall buildings policies which are unclear, opaque and non-transparent to the public as well as contrary to the London Plan. (Paragraph 5 above) The Tall Buildings Statement is inadequate as supporting evidence to the 19.2 Draft Plan. It provides no clarity to developers or the public as to anticipated building heights or what might prove acceptable/unacceptable (contrary to NPPF 154). It avoids all mention of any building height above the OPDC definition of 15 storeys. Policy SP9 on Built Environment and Policy D5 on Tall Buildings claim that 'appropriate' building heights will need to conform with London Plan policies, while relying on additional 'Place' policies and site allocations to circumvent the London Plan at Old Oak North and Scrubs Lane.</p>
82	1426	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		SP9		<p>10.9 As at mid 2018, having tracked closely the preparation of the OPDC Local Plan, we see no sign of an imaginative, world class new city area being realised for this part of London. Instead we see a planning authority • publishing a 19.2 Draft Plan and Supporting Studies which are deliberately opaque on issues of housing density and resultant building heights, to the point of being dishonest with the public.</p>
110.b	1448	Community Group	Robin	Brown	Grand Union Alliance		SP9		<p>Therefore, to deliver on the proposed outcomes it is necessary to add to Policy SP9:. SP9 a) ii) responds appropriately to Does no harm to the setting of sensitive locations identified in figure 3.15, including protecting and enhancing designated and undesignated heritage assets, open spaces and existing residential communities and ensuring that these help shape local character and townscape; SP9 iii) ensures appropriate the highest standards of amenity and meets EU or national health based standards and objectives for No2, PM10 and other particulates for all residents, workers and visitors; SP9 iv) Add text from paragraph 3.76 to existing (iv): and actively contribute to improving safety, reducing crime and the fear of crime.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
110.b	1449	Community Group	Robin	Brown	Grand Union Alliance		SP9		In relation to SP9 b), which anticipates a wide range of locations for tall buildings, it is also essential to enhance and strengthen the requirements for the production of new elements of the built environment in terms of amenity. In relation to air pollution, planning determinations have also seen a poor actual outcome in amenity and air quality. However, the areas remain highly polluted and planning conditions have included requirements for artificial ventilation and closed windows. Nonetheless, play grounds and outdoor amenity spaces remain highly polluted (again, the relevant case here is the Mitre Yard determination). This is obviously a perverse outcome; the expectation should be that developments take place in areas where appropriate standards of air quality have been achieved. The amendments to the requirements and locations for tall buildings exacerbate this, and so we suggest the following specific changes to SP9 b):: This policy is insufficient to deliver the policy proposed outcomes of the Strategic Policies, as it offers no qualification as to how good amenity elements for tall buildings will be incorporated into a good growth and high quality design solution for the area. There is no basis offered in policy in this section on which to judge the relevance, benefits or appropriateness of the tall buildings in new neighbourhoods across the area. While we acknowledge that tall buildings need to play a role in the OPDC area, this needs to be specified in clear and actionable policy terms, or the financial and infrastructural pressures of sites will lead to highly undesirable outcomes. This renders the Plan ineffective and unsound. This policy as it stands is at odds with the other key strategic policy ambitions, including the Mayor's overall goal of Good Growth (Draft New London Plan, 2018, Chapter 1). We recommend the following addition to (b) to make it consistent with the wider proposed outcomes/objectives of the plan, and to reduce scope for uncertainty: (b): delivers high densities and a range of building heights. Tall buildings need to be assessed on their own merits to avoid harm and protect and enhance identified sensitive locations and accord with all other relevant policies within OPDC's Local Plan.
110.b	1504	Community Group	Robin	Brown	Grand Union Alliance		SP9	3.15	Fig 3.15 Sensitive Locations depicts areas where tall buildings are an appropriate form of development in principle. These are located close to most of the existing residential enclaves and/or heritage designations to their environmental and amenity detriment. Originally, they were part of 'sensitive locations' that were to be respected and reflected in lower densities and buildings of more restrained height that related more to their surroundings. But now it is proposed that buildings of 16 storeys and above are appropriate. This is a regressive change.
110.b	1560	Community Group	Robin	Brown	Grand Union Alliance		SP9		The proposed Old Oak target of 25,000 houses is not achievable. Every test simulation creates a packed cluster of Hong Kong-type tower blocks. Everyday people often do not wish to live under these conditions. More important, tower blocks are expensive to build, and as a consequence, the housing, even for a small unit, will be outside the reach of the average citizen. Witness the impact of the Elizabeth/Jubilee/DLR on Canary Wharf, where only a small flat can cost over £2,000,000. This, as proposed, would not be a place for Londoners and their families, but sold to wealthy investors.
110.b	1570	Community Group	Robin	Brown	Grand Union Alliance		SP9		London is a city of high amenity, whether theatre, arts, food, or markets. These bring life and excitement to areas. We would hope that such an important area, with one of the highest levels of accessibility in Britain be given serious consideration for culture.
237	1584	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		SP9		There is much needed support for a 'buffer zone' around existing communities of low rise and green space, in particular around the HS2 station where they have ambitions (not specified in the local plan) for 42 storey buildings around the HS2 station, right at the back of Wells House Road. This could be solved by: moving the station entrances to the centre of the site and building higher on the Car Giant land instead, which would not impact on any existing communities. This would be a benefit to ALL STAKEHOLDERS: local communities, the Scrubs (whose entrance from the station would be onto the playing fields) and relaxing of regulations in Park Royal to allow for areas of more mixed use. I get the need to keep residential away from noisy businesses but these are a minority. Park Royal would benefit from some 'local-style' housing above existing Alnet warehouses, live work creative spaces and affordable studios. It could become a buzzing area like Hackney Wick and Shoreditch with artist studios and community cafes

Policy SP10: Integrated Delivery

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
204	19	Local Resident	Anita	Ringsell			SP10		There were two Architects at the last meeting I attended and both cited the lack of thinking about infrastructure. As they said this is not Shanghai or Madrid or Paris, and those countries have put in place the necessary roadworks, tunnels etc to support the tall buildings that have been built. London is a small city compared to those places.
42	192	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	SP10		We welcome the clarification provided in relation to the way in which the equalization mechanism for infrastructure will operate.
98.b	613	Strategic Partner	Luke	Burroughs	Transport for London Commercial Development		SP10	3.1	It is welcome that site allocations and housing supply estimates have been amended to reflect that no housing units or commercial floor space could be delivered at the Elizabeth Line Depot within the plan period but should be identified for delivery in the longer term beyond the plan period.
28	693	Strategic Partner	Lucinda	Turner	Transport for London		SP10		We are pleased that references to the Elizabeth line depot site being delivered as part of the current Local Plan have been removed as previously requested. We will work with OPDC should any opportunities and funding arise, but the presumption must be that the Elizabeth line depot could only be feasible for development (whilst retaining operational uses) in the longer term. With the exception of design and consents activity, this will be beyond the Plan period as confirmed in the amended policies and text.
28	723	Strategic Partner	Lucinda	Turner	Transport for London		SP10	Paragraph 4.43 and Table 3.1	TfL is pleased to note that the amendments to Paragraph 4.43 confirm that the Elizabeth Line depot and the London Overground depot at Willesden Junction are not included in the current Local Plan site allocations and that they have been removed from Table 3.1 as requested.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
35.b	1033	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	SP10		We note the OPDC's development phasing referred to in this Policy and set out in Figure 3.16. We believe that through collaborative working with the OPDC and other key stakeholders, QPR and SCD can assist in improving this trajectory by bringing forward early development on the land within which they have interests. We are in a position to commence the process to deliver the development of Oaklands North now. Likewise, the EMR site can be brought forward early in conjunction with the construction of the new link to Willesden Junction Station. Furthermore, additional early development can be achieved along Scrubs Lane, particularly at the Laundry Cluster.
35.b	1034	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	SP10	3.1	Table 3.1 should acknowledge that the development of Oaklands has commenced. Additionally, the EMR site is capable of greater and earlier delivery of new homes and other development than is suggested. We would also suggest that there should be flexibility in the balancing of new development between the amount of residential and commercial space, which should be developed through the design process and with appropriate reference to market needs to ensure that sound placemaking delivers a successful scheme in all respects.
55	1043	Agent	Jonathan	Stoddart	CBRE	Segro	SP10		In further developing the Local Plan ahead of submission, we recommend that OPDC: •Revises its proposals for Victoria and Westway industrial estate to make the most effective use of thisland for redevelopment, and to maximise likelihood of delivery;
55	1049	Agent	Jonathan	Stoddart	CBRE	Segro	SP10		Paragraph 182 of the NPPF sets out the four tests of soundness when examining local plans. They include: • Positively prepared – the 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 and based on effective joint working on cross-boundary strategic priorities; and • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. Our observations and assessment of the Second Revised Draft Local Plan are set out below, with these four tests in mind. Overall, we support a number of the changes made to the plan, including the reorganisation of the employment section, and the introduction of site allocations in Park Royal. There are however a few specific areas of the plan which we would like the OPDC to reconsider, and have described these matters and our recommendations for resolving them below.
55	1050	Agent	Jonathan	Stoddart	CBRE	Segro	SP10		SEGRO owns two significant industrial estates within the Old Oak area: Victoria and Westway. These sites are proposed to be released from the SIL designation, and allocated for residential-led redevelopment within plan. The Victoria Industrial Estate is allocated for a minimum of 1,100 homes, and circa 6,500sqm commercial floorspace. The Westway Estate is currently allocated for a minimum of 1,000 homes, and circa 4,800sqm commercial floorspace – these figures represent a significant decrease on the previous versions of the plan which proposed 1,400 homes and 7,700sqm commercial space. Both Victoria and Westway have very high occupancy rates and are currently operating successfully as industrial estates. The existing use values of these estates are relatively high, and in the context of growing demands and falling supply of urban logistics trends, are likely to increase over time. Given this context, it is important to SEGRO that the overall scale of residential-led development is maximised to justify the release of industrial land to alternative uses.
55	1051	Agent	Jonathan	Stoddart	CBRE	Segro	SP10		With regards to the quantum of development at Westway, we recommend that the quantum of development previously stated is reintroduced. The recent reduction does not appear to be justified (there is no explanation within the Development Capacity Study) and it will not be effective as it does not provide a sufficiently attractive proposition for us to release the site for residential-led redevelopment.
55	1052	Agent	Jonathan	Stoddart	CBRE	Segro	SP10		In terms of the commercial element of the allocations, the previous versions of the plan described the commercial floorspace as indicative, whereas they are now described as a minimum. Given the location of these two sites - for Victoria, a location with no street frontage, and for Westway, a location with no street frontage or commercial setting - we are not convinced that either site can viably support these minimum commercial space requirements. Instead, we propose that the commercial floorspace requirements are reduced and offset by increases in residential use. Again, we recommend this to ensure that these site allocations are effective in the context of the NPPF.
55	1055	Agent	Jonathan	Stoddart	CBRE	Segro	SP10		Furthermore, the latest version of the plan also identifies it as a site for industrial intensification. In our previous consultation response to the plan we encouraged the allocation of sites in Park Royal for redevelopment and intensification, and so we strongly support the recent identification of this and other sites for industrial redevelopment.
56	1116	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		SP10	Para 3.10	List of precedents that may allow consideration of the visual impact of density. The 2 precedents with similar densities as proposed in Old Oak (average of 600 dwellings/hectare) appear to be individual buildings while Old Oak is a large area where average densities of 600 dwellings/hectare are proposed so there will be parts with much higher density. There is no precedent listed for the higher range densities, and therefore it is unclear what kind of living environment would be the result of such densities.
110.b	1440	Community Group	Robin	Brown	Grand Union Alliance		SP10	3.1	This draft Local Plan provides numerical site allocations which are or may not be sound estimations of optimum capacity and phasing, and absolutely no qualitative guidance on place ambitions (who, why, how, where?) and the desired local character of OPDC's important new Metropolitan Town Centre other than in a formulaic way. In many cases the policy wording, stated vision, and adjoining spatial key diagrams seem not to reflect each other.
110.b	1445	Community Group	Robin	Brown	Grand Union Alliance		SP10		The OPDC development model is predicated on speculative investments. It should have more incremental development and intelligent co-location in intensively designed manners. Otherwise this plan's legacy is unlikely to create new heritage or augment what is unique and worth celebrating about the existing places and communities within and around the OPDC area.
110.b	1446	Community Group	Robin	Brown	Grand Union Alliance		SP10		We consider the Plan as read as a whole, including most of its component parts that we have commented on to be unsound: that it is not positively prepared, justified, effective, deliverable and consistent with the achievement of sustainable development.
110.b	1450	Community Group	Robin	Brown	Grand Union Alliance		SP10		Table 3.1 Site Allocations: There have been numerous unannotated changes to the site allocations planned quantum of development which have not been noted or justified. The Elizabeth Line Depot sees a loss of 3000 houses and 41,300 jobs from the plan period. But most site allocations have revisions up or down, with no discussion of justification of these in terms of financing, infrastructure or phasing.

Chapter 4. Places

General

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
33	801	National Body	Mark	Furnish	Sport England		P1 to P12		Sport England notes that most of the place polices have omitted the infrastructure requirements to avoid conflict with Strategic Policies. It is noted that the infrastructure requirements would be set out in the Infrastructure Delivery Plan but, in the interests of clarity of what is required where, it would be useful to have this included within the Local Plan Places Policies.
33	802	National Body	Mark	Furnish	Sport England		P1 to P12		In addition, with the omission of infrastructure and the lack of acknowledgment of sport under 'Public Realm' and 'Green Infrastructure', sport facilities does not appear to have significant consideration. Sport and recreation facilities are also important for the health and wellbeing of communities and should be mentioned in the Places Policies.

P1 Old Oak South

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	38	Planning Consultant	Ashley	Collins	JLL	Imperial College	P1	d); and Para OOS.5	The emphasis of new commercial development in Old Oak South and the creation of a new centre are both supported, as is the emphasis on creating 34,000 new jobs, with nearly half of these in the plan period. However, Imperial College London requests that in the final draft, part d) of the policy and the reference in paragraph OOS.5, which refers to the new space being within Use Class 'B1a' (offices), should be widened to 'B1', thereby enabling research & development and other similar uses to also come forward, as they can play a significant role in securing the future success of the area.
90	145	Local Resident	John	Cox			P1		POLICY P1: Old Oak South Development and Phasing Delete: "and the Intercity Express Programme Depot". Reason: The IEP depot land should remain protected operational railway land, beyond the Local Plan period. There is a shortage of such land in London to support current and future railway projects. For instance, both the recent Wembley Chiltern Line and the Hornsey Thameslink depots had to be built on non-optimum sites because there was no alternative. The situation gets worse over time. Whether the IEP depot is relocated or not is irrelevant; it is the land that must be kept. One future possible use is for additional platforms. The high-speed system will likely spread across the country over coming decades, for instance with a second high-speed line to London, south from Nottingham, via Leicester. The current four-track GWML line through Ealing is a bottleneck, and it is desirable to build a bypass tunnel from west of Old Oak Common Lane to the edge of London. But there are similar arguments for a bypass high-speed line for the South-West Main Line (SWML) and a joint tunnel, west from Old Oak Common, could support both routes, before they separated again towards Reading and Guildford. That would suggest reusing the ex-Eurostar platforms at Waterloo, and a tunnel towards new high-speed SWML Old Oak Common platforms on the ex-IEP depot site, before entering the shared tunnel to the west. Another reason to exclude the IEP depot land is the fact that Wormwood Scrubs is not a park, and a narrow strip of new development between the GWML tracks and Wormwood Scrubs would forever be hemmed in and isolated.
13	232	Strategic Partner	Paul	Gilfedder	HS2 Ltd.		P1C1		With regard to policy P1C1(F) the delivery of town centre uses within and around Old Oak Common station wol be considered insofar as they can be delivered under High Speed Rail (London-West Midlands) Act 2017.
13	233	Strategic Partner	Paul	Gilfedder	HS2 Ltd.		P1C1		For the avoidance of doubt, Old Oak Common station is being designed to deliver a station to accommodate the forecast Railplan Scenario 28 passenger demands, with a capacity of 54,366 passengers in a 3-hour am peak. Anthing other than the Act scheme would require a fresh instruction from the DfT and be for others to fund.
13	234	Strategic Partner	Paul	Gilfedder	HS2 Ltd.		P1C1		With regard to policy P1C1(G), for the avoidance of doubt, a 24 hours east west route across the station site is a consideration in the station site design, but the Old Oak Common station building will not be accesible 24 hours a day.
16	248	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P1		2.2 We also note that what was the "Green Bridge" in the last Plan has now become a simple "Bridge" – no explanation. Perhaps more important, it has been moved further west and yet in Figure 4.45 (Wormwood Scrubs POLICY) it is in its previous place. It may be that it is meant to be a continuation of Old Oak Street, previously Old Oak High Street, which in turn has been moved in this Plan. The Tracked Changes comment in relation to a connection to the south of the Station - "To confirm the form of the connection across the Intercity Express Depot has yet to be defined" - provides no guidance because the bridge is to the east of the IEP depot in all its manifestations. The situation of this bridge is of the utmost importance to us because, as we contended in our response to the last Plan, there should be a feasibility study of a single access point to the north of the Scrubs at or near the point as shown in Figure 4.45 of this Plan (and Figure 4.3 of the last Plan), and we can find no justification for its apparent move.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
16	249	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P1	OOS.12	<p>Equally important will be providing a new bridge to Wormwood Scrubs off Old Oak Street, to enable communities to access this important area of Metropolitan Open Land and Metropolitan Park. In addition, Old Oak Common Station should not preclude a connection to the south in the future. Any connection will need to consider how it will cross and provide passive provision for future development on the IEP Depot.</p> <p>This is the passage to which the Tracked Changes comment above applies. We have tried to piece together references in this Plan to access from the Station to the Scrubs and the IEP Depot effect.</p> <ul style="list-style-type: none"> • Fig 4.2 p 52 shows a single access point (walking and cycling route) running north-south in the middle of the Station but terminating above Wormwood Scrubs Street. • Fig 4.45 (Wormwood Scrubs POLICY) p 114 shows three access points (walking and cycling): one in the centre of the Station (but not running its full length as in Fig 4.2) and one on either side, all three terminating above Wormwood Scrubs Street. • Part of WS6 (Wormwood Scrubs Policy) p 116: 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. The following key walking and cycling routes and enhancements are proposed: a) from Old Oak Common Station and surrounds; b) from Old Oak Street via a high quality bridge (formerly "green bridge"); <p>We are unclear whether the arrows on either side of the Station are "and surrounds".</p> <ul style="list-style-type: none"> • The Infrastructure Delivery Plan (see Summary of Supporting Studies) refers at TP12 to TP14 in relation respectively to a Route through the Station to Wormwood Scrubs, Route to Wormwood Scrubs east of the Station and Route to the Scrubs west of the Station to an "Underpass or Overbridge (tbc)." • OOS. 3 p 54: Early development in Old Oak South will be supported. However, it is likely that most of development in Old Oak South will be delivered after the opening of Old Oak Common Station in 2026 and development on the Elizabeth Line depot and sidings and IEP depot is not envisaged to commence until beyond the Local Plan period. • OOS. 10 p 54: The delivery of Wormwood Scrubs Street is expected to take place after the plan period and is contingent on the redevelopment of the IEP Depot. Although outside of the plan period, development proposals should appropriately safeguard Wormwood Scrubs Street's future delivery. • SP4 (para 3.20) p 23:homes are deliverable within the Local Plan period (2018- 38) (probably more realistically 2019-39 given the latest date for adoption of Spring 2019) <p>2.4 The effect of the above is that there can be no Wormwood Scrubs Street or access direct from the Station (or on either side) to the Scrubs until (probably at the earliest) 2039 by which time the Station will have been operating for thirteen years. It is clear that the opening of the Station is not dependent on access to the Scrubs. Why after such a period without such access it should be thought necessary to provide it is not explained. 2.5 We are incidentally puzzled by the termination of the access points above Wormwood Scrubs Street which does not seem to be consistent with the texts we have cited.</p>
16	250	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P1		<p>2.6 We are re-visiting this subject because we are disappointed to see no change of substance to the proposal for access to the Scrubs from the Station in the light of (a) a meeting members of our committee had with the Chairman and former CEO of the OPDC on 13 November 2017 and (b) the lack of support for it in the Consultation Responses to the last Plan. As to (a) we were given to understand that such access was no longer proposed. Maybe what should have been said was that it was not proposed during the life of this Plan (because of its physical impossibility while the IEP depot remained in situ). But that was not what was said. As to (b) we can find no support for such access in any of the responses. We cite just one, from the Charitable Trust: "The Trust remains opposed to direct access from the proposed station area into Wormwood Scrubs on the grounds that it would lead to a deterioration of the existing green infrastructure". POLICY P12 WS1 p 116 tells us that the Charitable Trust will need to agree any "enhancements".</p>
16	251	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P1		<p>2.7 We have repeatedly acknowledged the need for access to the north of the Scrubs for the new communities in Old Oak (and see our comments in 2.2 above). They will not require a route via (or immediately next to) the Station. We have yet to see articulated in the various preparatory documents and Draft Plans, culminating in this Plan, the need for such walking and cycling access. Travellers from Birmingham and, later, Manchester and Leeds, are unlikely, we would have thought, to be making the journey in order to visit the Scrubs (however attractive a destination it may seem to us). They are most likely to be travelling on to central London or London Airport for which there will be ample connections. As for cyclists, if they are members of the Old Oak community, what would be the attraction of going through the Station? And if they have travelled by train and need to access a cycle route then they will not have to achieve this by cycling from the Station to the Scrubs.</p> <p>2.8 We urge the above points in support of our contention in our response to the last Plan that the proposed routes direct from the Station (and on either side) are not justified.</p>
113	397	Local Resident	Thomas	Dyton	WHRRRA (Member)		P1		<p>We should also remind you that HS2 has made verbal promises of green space between its station and Wells House Road and this is demonstrated in most images produced by HS2.</p>
113	401	Local Resident	Thomas	Dyton	WHRRRA (Member)		P1		<p>We again reinforce the need to move the main station entrance to the east/centre of the site. This would be a benefit to ALL STAKEHOLDERS: local communities, the Scrubs (whose entrance from the station would be onto the playing fields).</p>
92.b	433	Community Group	Melanie	Whitlock	The Hammersmith Society		P1		<p>Policy P1 Old Oak South supporting text para 10 and elsewhere: The Draft Plan persists in including the "green bridge to Wormwood Scrubs" in a particularly insensitive and inappropriate location for introducing additional visitors to the Scrubs, as local groups have pointed out in the past. There is no evidence base to suggest that rail passengers will require to access central Wormwood Scrubs – where there is no central pedestrian path – in large numbers. For this reason and because there is no development planned for the strip to the south of HS2 in the lifetime of this Plan the bridge in its proposed location is unjustified and the Scrubs would benefit from being left with present access points to east and west.</p>
93	514	Residents Association			Wells House Road Residents Association		P1		<p>We should also remind you that HS2 has made verbal promises of green space between its station and Wells House Road and this is demonstrated in most images produced by HS2.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
93	519	Residents Association			Wells House Road Residents Association		P1		We again reinforce the need to move the main station entrance to the east/centre of the site. This would be a benefit to ALL STAKEHOLDERS: local communities, the Scrubs (whose entrance from the station would be onto the playing fields).
47	583	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		P1	Fig 4.2 & 4.32	In line with previous comments the Council seeks a firmer commitment to delivering the proposed Wormwood Scrubs Street connection to Kensal within the Plan period.
47	584	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		P1		The Council considers that the proposed designation of Old Oak High Street as a "Major Centre" is appropriate. This reflects the scale of the wider development. The safeguards set out within Chapter 10 are such that that should ensure that the scale of town centre development will not have a significantly detrimental impact in the vitality of adjoining centres in this borough.
98.b	612	Strategic Partner	Luke	Burroughs	Transport for London Commercial Development		P1		TfL CD welcomes the revision to identify that future commercial and residential development in conjunction with continuing operational use of the Elizabeth line depot could realistically only come forward beyond the Local Plan period.
98.b	614	Strategic Partner	Luke	Burroughs	Transport for London Commercial Development		P1		It is welcome that the document removes references to the Oak Common station site or Elizabeth Line Depot and sidings as the most appropriate site for delivery of a primary school. We recognise there may be a need for primary school provision across the OPDC area, but given the uncertainty and long term delivery of the Elizabeth Line Depot site alternative sites should be considered.
98.b	615	Strategic Partner	Luke	Burroughs	Transport for London Commercial Development		P1C1		TfL CD strongly supports the identification that high density housing is a suitable land use within the area. It should be made clear in policy that railway station development within the OPDC area (redeveloped or new) should aim to optimise housing delivery where possible, as a key component of a sustainable, mixed use scheme, in line objectives of the Draft London Plan. For example, Paragraph 5 of the policy focuses on ensuring that any new station development has exceptional design quality. However, there is no reference the design of the station facilitating the delivery of higher-density housing above or adjacent to the station; this would fail to optimise the site's potential in line with national NPPF and London-wide planning policies.
28	724	Strategic Partner	Lucinda	Turner	Transport for London		P1	Policy, Paragraphs OOS3 and OOS4	TfL is pleased to note that amendments to the policy wording and supporting text, including adjustments to the number of jobs and homes now recognise that redevelopment of the Elizabeth Line depot site is a long-term scheme that will take significant resource and investment to deliver and that references to the Elizabeth Line depot site being delivered as part of the current Local Plan have been removed as requested. Policies to facilitate potential longer term redevelopment will be important and TfL will continue to work with OPDC to bring forward development of the depot site if it is found to be feasible.
28	725	Strategic Partner	Lucinda	Turner	Transport for London		P1	Policy, Paragraphs OOS3 and OOS4	Any future redevelopment on the depot site will need to be both viable and deliverable, which may impact on the end uses that can be provided. The site cannot be considered in isolation and has to work as part of a long-term holistic strategy. To support this longer term aspiration, policies should ensure that proposals for neighbouring sites coming forward in advance of the redevelopment of the depot site should not preclude development of it or sterilise it and indeed where possible create opportunities for its appropriate and comprehensive development.
28	726	Strategic Partner	Lucinda	Turner	Transport for London		P1	Policy part h	TfL notes the intention to deliver active and positive frontages along the edge of the Elizabeth Line depot site. Although this is supported in principle, the operational needs of the depot must be considered including site security, the impact of noise generating activities in the depot and the need for 24 hour access.
28	727	Strategic Partner	Lucinda	Turner	Transport for London		P1C1	Policy part i (iii)	As noted in the Old Oak Bus Strategy, Old Oak Common station will be a critical hub for the local bus network therefore the policy should specifically acknowledge the importance of providing adequate and conveniently located bus stops and stand infrastructure to facilitate convenient interchange and to support the efficient operation of the local bus network. TfL suggests it is reworded to state: Providing a high quality transport interchange for passengers and efficiently integrating the station with the wider surface transport network by: locating and distributing surface transport interchange and operational facilities (bus stops, stands, cycle parking, taxi ranks etc.) in appropriate and convenient locations to adequately serve the station and to support the effective integration of the station within the surrounding public realm and movement network, whilst ensuring that the surrounding public realm is not vehicle dominated.
119	864	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P1C1		Policy c) suggests integration with the surrounding areas but most users will not need direct access to the scrubs and this is among the most sensitive habitats on the scrubs By providing interpretation (labels, what to see boards, bird hides, Wi-Fi enabled interpretation, nest boxes etc) access to nature from the station could be achieved without physical access. OOC 11 could be added to make clear there are several opportunities to Access nature (Policy n)) without the need for direct access onto the Scrubs. Such as using Wi-Fi for interactive interpretation of live feeds from bird nest boxes. Plans need to clarify entry to WSS not the scrubs
119	865	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P1		We note that the new Tall Buildings statement will have an impact on this place Fig 2 of the Tall buildings statement shows a buffer zone between Tall buildings zone and the Scrubs. This appears to be the same as land parcel 17 on Fig 11.3. Could there be some clarification that this is a buffer zone? Since this zone might not be developed for 21+ years a clear character description should be given in supporting text. Fig 4.2 should show a buffer zone with supporting text describing this zone as: building heights to 6-8 stories, maximises green infrastructure and allows for public open spaces that link with WSS.
119	866	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P1	OOS.10	Description of WSS required OOS.10 should refer to the intended character of Wormwood Scrubs Street (Lane) as 3.57. There should be a clarification that the embankment is retained where possible.
119	867	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P1	OOS.12	Fig 3.13. shows the bridge link as an Urban Greening Corridor Hopefully the intention is still to make the most of green infrastructure along this route. Supporting text should make clear there is no direct access to the scrubs OOS 12 Reference should be made to the Urban Greening initiative.3.67 "...Old Oak Common Station should not preclude a connection to the south Wormwood Scrubs Street in the future..."

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35.b	1035	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	P1		The development of Oaklands delivers on the vision for Old Oak South and on the various aspects of the Policy. This includes the early delivery of new homes, commercial space, public open space and the first phase of Park Road. The fact that this development has now commenced should be acknowledged in the supporting text.
56	1118	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P1	c.	LBHF note that the capacity for homes and jobs in the Old Oak South area has decreased, with the jobs target reduced significantly from 41,300 to 15,200. We understand this is due to the TfL Depot sites not coming forward for development in over the Plan period. However, whilst LBHF understands the circumstances for this reduction, LBHF consider this to be a considerable missed opportunity to improve placemaking and job creation in this area. Given the proximity to the new Old Oak Station, these sites would have delivered the commercial element that would have created a mixed use hub alongside the rail infrastructure which could have boosted job opportunities and place making.
56	1119	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P1		Welcome the inclusion of a specific reference in the policy to the need to deliver high quality, well-connected, network of multifunctional publicly accessible open spaces. Although it should be noted that as well as providing such spaces on a large scale such as the 2 hectare Old Oak South Local Park and the Grand Union Local Park etc, that small scale (e.g. street level) green infrastructure is also important and can provide a range of benefits. Include reference to a range of open space types in the policy.
56	1120	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P1		Public open spaces and station squares should promote natural green landscaping, trees etc. where possible to create more attractive environments, rather than swathes of hard landscaping. Maintenance and management plans for public open spaces must be agreed with boroughs and any proposals must not place any additional burden on the council's budget.
56	1122	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P1		The supporting text, as currently drafted, does not say much about the multifunctional benefits of open space and green infrastructure. It is noted that efforts have been made to remove text from a number of sections, but I think it would be beneficial to have some supporting text on this issue. Include text on the multi-functional benefits of green infrastructure and open space.
56	1123	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P1C1		Welcome the inclusion of the green infrastructure related policies which as well as highlighting the need to provide large-scale open spaces such as the Old Oak South Local Park, also refers to the smaller scale green infrastructure measures.
56	1124	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P1C1		The Supporting Text for this Policy could say more about the multi-functional requirements of open space/green infrastructure wherever it is provided in the OPDC. It is also stated that a lot of open space will be hard landscaping, however this can also be multi-functional (e.g. if it consists of permeable paving). As for P1 Supporting Text, include text on the multi-functional benefits of green infrastructure and open space. Note where references are made to open space and that this is to be hard landscaping, that this should be permeable paving.
56	1125	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P1C1	Para OOC.5	"To reflect the station's significance, its design quality should be exceptional and will be expected to deliver inspiring spaces, structures and buildings." Add: "The station should pioneer "Smart City" concepts as well as demonstrate highest environmental standards."
110.b	1451	Community Group	Robin	Brown	Grand Union Alliance		P1		Fig. 4.2, P1C1 d), e), f): There is a lack of clarity on degree of vehicular access and accessibility through Old Oak North and south. Routes are shown, together with walking, cycling and bus service networks, but not for private, service and taxi etc. vehicles, making difficult to assess the functionality of proposals. Indeed, more detailed work on siting(s) vehicle gate(s) is needed and delivery routes are still being worked on [source: OPDC's Transport & Old Oak Presentation event]. For example, the adequacy of private vehicle and taxi access to Old Oak Common Station for 'kiss and ride' [see 7.35] or, say, to community hubs in Old Oak is not adequately described. If not on fig.3.10 Proposed Connections, then Policy T1 Roads and Streets should appropriately depict levels of accessibility. Not everyone is able, even if so inclined, to adopt 'active travel behaviour'. Excluding or hindering the less mobile to access facilities raises equalities issues and the OPDC's fulfilment of the Public Sector Equalities Duty.

P2 Old Oak North

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23	115	Local Authority	Muhammed	Butt	London Borough of Brent		P2		We would also highlight inconsistencies in wording in policy P2 Old Oak North and associated figure 4.7. Supporting text states Old Oak Street extends to Willesden Junction but this is not reflected in figure 4.7 where it terminates at 'Harlesden Place.' If this is the intention this is a concern as it is contrary to the need to create a strong connection to Harlesden as emphasised elsewhere in the Plan. In addition, figure 4.7 indicates Harlesden Place is a green space but this is not referred to in policy under Green infrastructure and environment. These inconsistencies need to be clarified.
23	117	Local Authority	Muhammed	Butt	London Borough of Brent		P2		Change sought: For figure 4.7 to be amended to highlight Old Oak Street connects to Willesden Junction Station.
23	118	Local Authority	Muhammed	Butt	London Borough of Brent		P2		Change sought: For clarity to be provided on Harlesden Place and its function in policy P2 under Green Infrastructure and environment.

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76.b	176	Strategic Partner	Duncan	Green	Diocese of London		P2		<p>1. We would have expected that Harlesden be best served by the 'New and improved junction/ bridge/ underpass' (Park Road), running from North to South, as opposed to from East to West. We are also surprised that a bridge with a link to Wormwood Scrubs has taken precedence over a bridge with a link to Harlesden.</p> <p>In the previous proposal there was a greater link from North to South (with Harlesden) which we feel would be more constructive for the community of Harlesden, That is, we struggle to see how the amendment in direction addresses the following statement of the Town Centre section of the report: 'There will be significant opportunities for Harlesden to try and capture trade from the new population. and there is also a need to ensure that any risks to the functioning of the centre are appropriately mitigated, To explore and support opportunities for the centre, schemes caught by the relevant threshold will need to engage early with OPDC and the London Borough of Brent to consider, where required, contributions to measures that would potentially support the continuing viability and viability of the centre.' (10, 11)</p>
42	188	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P2		We note that the spatial vision for Old Oak North has been updated to reflect the work undertaken by AECOM, and we will need to undertake further work to understand how this new approach fully affects the design and delivery of OOP. We seek clarification as to the definition of a Mixed Use Area, which is the designation for the eastern part of OOP, and how this differs from a Major Town Centre which is the designation for the western part of OOP. We would also encourage recognition of the potential for a station at Hythe Road to contribute towards the Major Town Centre, and as such would encourage flexibility on the application of these designations at OOP.
42	193	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P2		We welcome the recognition of the potential for OOP to deliver more homes and jobs beyond the Plan period, but note the significant reduction in the minimum development quantum which is principally reflected in the reduced target for commercial floorspace. We consider that the site has capacity for more homes and jobs and consequently welcome the recognition that these numbers represent minimum capacities.
42	194	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P2		The revised key diagram reflects the masterplan work undertaken by AECOM, set out within the accompanying Old Oak North Development Framework Principles document. The diagram (and supporting document) reflects an arrangement of roads, spaces and development plots that is different to our emerging masterplan, and so we will need to fully test and understand this revised diagram before we can fully comment on its appropriateness. At this stage, however, we wish to note that we have expressed to OPDC our disagreement with some elements of the diagram, in particular the location and alignment of certain roads, the amount of open space and the relationship of development plots to the viaduct/embankment, and we continue to reserve our judgement on the development framework principles suggested by AECOM for the OOP site.
42	195	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P2		We support the endorsement of a viaduct solution for the West London Line. We would also welcome the provision of a new overground station at Hythe Road, but would note that our proposed development at OOP does not rely on the station with reference to Land Uses part F) and supporting text at OON.7.
42	196	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P2	C) iii)	We consider that reference at Land Uses part C) iii) to 'B1c uses along the ground floor fronting on to the Haul Road' is too specific, and should be explored through submission of a masterplan planning application for the site.
42	197	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P2		As noted above in relation to policy SP8, we consider that the requirement for 30% of the developable land in Old Oak North to be public open space will be a considerable challenge, especially given the requirement to deliver two 2ha local parks, and achieve the development quantum required to deliver a viable development on the site. OPDC, through its work with AECOM, has not yet demonstrated that this level of provision is achievable alongside meeting the homes and jobs targets for OON, and as such we object to the inclusion of this requirement.
42	198	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P2C1		We welcome the deletion of the Grand Union Square Cluster policy P2C1.
90	239	Local Resident	John	Cox			P2		<p>The 'Policy', which says: "Proposals should plan positively to deliver the place vision by contributing and/or delivering where appropriate and relevant as follows:"</p> <p>DELETES a section which used to say:</p> <p>"- Contributing to the provision of a range of homes across the place including:</p> <ul style="list-style-type: none"> - focusing a higher amount of family-sized housing around Old Oak Gardens and Stamford Gardens [where do those names come from?]; and - focusing a higher amount of smaller housing units around the Rolls Royce Building." <p>The reason is given as being:</p> <p>"as a result of Reg 19(1) consultation" and</p> <p>"to provide flexibility for location of different residential unit sizes."</p> <p>I believe the Local Plan becomes unsound unless some replacement wording/guidance on the range of Old Oak North homes is provided.</p>
90	240	Local Resident	John	Cox			P2C1		<p>POLICY P2C1: Grand Union Square Cluster:</p> <p>"The cultural heart of Old Oak North, Grand Union Square will be an attractive city square contributing to the Grand Union Canal Local Park. The square will celebrate the relationship between the canal, Old Oak High Street, Hythe Road Station and the Birchwood Nature Reserve"</p> <p>is entirely REMOVED, to</p> <p>"reflect change in character resulting from relocation of Old Oak Street away from Grand Union Square and avoid repetition with policies elsewhere in the plan."</p> <p>We seem to have lost the heart of Old Oak North. There needs to be a clearly-stated replacement heart. What is it?</p>
90	241	Local Resident	John	Cox			P2	Fig. 4.7	<p>The new Old Oak North Park in Figure 4.7 has a walking and cycling route running diagonally across it. The Local Plan must document to the Planning Inspector how that is a safe route 24 hours a day (if it actually is).</p> <p>The Local Plan and officers have been vague about the southern boundary of the park, including when explaining it to the OPDC Planning Committee.</p> <p>Does it reach the station boundary? Or a fence on the northern side of a road (is there a road?)? Or are there buildings there?</p> <p>Possibilities must be documented to the Planning Inspector.</p>

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90	242	Local Resident	John	Cox			P2		It is not obvious that the now dog-legged and non-continuous Old Oak Street needs a continuous name, given that it is a shadow of its former self. Or does a bit of Hythe Road get renamed Old Oak Street? On the other hand, the name gives credibility to the previous attempt to link the HS2 station in the south continuously to Harlesden town centre in the north, now a sadly much-shrunken prospect, since most OPDC efforts have moved to the alternative, east-west Park Road. Anyway at the northern end of Old Oak Street, Station Approach does not need renaming, so the name Old Oak Street must reach as far as A404 Harlesden High Street / Harrow Road
36	291	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		P2		The Mayor notes that Policy P2 Old Oak North includes at j) ii) reference to an Energy from Waste (EfW) facility. The Mayor has stated in his Environment Strategy that he does not believe it necessary to have any additional EfW facilities built in London to manage municipal waste. The OPDC Local Plan should clarify this reference.
115	298	Local Resident	Nye	Jones			P2	j)	Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
210	308	Local Resident	Gail	Dobinson			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
211	313	Local Resident	Catherine	Goodall			P2	j)	I also object to Policy P2 which wants to expand the waste management capacity of the Powerday site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; currently I have my windows open and can smell it, plus my house is full of flies. It is disgusting. You should be shutting this place down and finding a different waste solution.
213	326	Local Resident	Rachel	Ritfeld			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
213	341	Local Resident	Rachel	Ritfeld			P2	j)	TITRA rejects utterly the draft Local Plan Policy P2 (p64) intention of “Making efficient use of Old Oak Sidings by: i) safeguarding the site for continued use as a waste management site with additional capacity; ii) supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. TITRA is fundamentally opposed to the continued use and development of the “Old Oak Sidings site – by which the OPDC means the Powerday waste site at Old Oak Sidings. This waste site was misconceived has caused odours for local people ever since. TITRA believes that Policy p2 i), ii), iii), continue the misconceived and foolish idea that waste sites can be maintained in the middle of residential. TITRA reminds the OPDC that Powerday company received a record fine of £1 million from the Environment Agency for its mismanagement of this site. TITRA believes TITRA believes that Policy p2 i), ii), iii), are unsound. Another solution to the waste management needs of Old Oak’s redevelopment must be found.
214	350	Local Resident	Ciara	Solmi			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
91	354	Local Resident	Bruce	Stevenson			P2	j)	As a resident of Goodhall St it seems completely absurd to both increase the population density of the are AND to expand Powerday - which produces dust rats terrible smells and is a detriment to our health.
215	357	Local Resident	Eileen	Walsh			P2	j)	I want to add my objection to any planning being given to Powerday and it’s continued use. Please consider local residents and the awful impact it has on our quality of life. OPDC’s Local Plan Policy P2, p66 clauses i) ii) iii) want to safeguard Powerday’s site at Old Oak Sidings for “CONTINUED USE WITH ADDITIONAL CAPACITY TO A DECENTRALISED ENERGY NETWORK FOR THE WIDER AREA.” Yours Eileen walsh; Stuart Mccaffer; Tippy Mccaffer; Ethel Mccaffer
216	358	Local Resident	Teresa	De La Rosa			P2	j)	I as a local resident object to the expansion of the Powerday site at the old oak site
94	359	Local Resident	Oonagh	Heron			P2	j)	I live in Stoke Place (-) and sat working this week in my own home where the smell of rotting rubbish from Powerday inside my house could only be prevented by closing all the windows while temperatures exceeded 30 degrees. Therefore I really object to the to Policy P2 which wants to expand Powerday’s waste-management capacity, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. Please don’t do this!

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32	388	Local Resident	Bernie	Timmins			P2	j)	I object in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
113	406	Local Resident	Thomas	Dyton	WHRRRA (Member)		P2	j)	We also note that OPDC intends to safeguard PowerDay, which received record-breaking fines recently and is totally unsuitable to be located close to residential communities. Local communities have suffered years of acrid smells, plagues of flies and pollution from additional HGVs from PowerDay and we are quite frankly gobsmacked that any developer would consider building homes close to this waste site.
92.b	434	Community Group	Melanie	Whitlock	The Hammersmith Society		P2		Policy P2 Old Oak North – Heritage and character k) i. Add to list “heritage canalside warehouse buildings at 44 Hythe Road”. The Hammersmith Society included these buildings in its submission to the Local Heritage Listings Consultation Document where they are proposed for the Local List, but we felt they are sufficiently important to be identified separately in the Local Plan.
219	447	Local Resident	Jane	Dreaper			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found. WE AS RESIDENTS WILL CAMPAIGN HARD AGAINST THIS. POWERDAY HAS HAD TO BE DRAGGED THROUGH THE COURTS BY THE ENVIRONMENT AGENCY BEFORE RECEIVING A RECORD FINE - ALL THE WHILE, DENYING RESIDENTS' COMPLAINTS THAT IT WAS A EMITTING NOXIOUS SMELLS. THIS COMPANY HAS A TERRIBLE RECORD AND DOES NOT DESERVE ANY EXPANSION. YOUR PLAN SHOULD SEEK TO IMPROVE THIS AREA, NOT WORSEN IT.
220	456	Local Resident	M.	Szoke			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
221	465	Local Resident	James	Trew			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
221	480	Local Resident	James	Trew			P2	j)	TITRA rejects utterly the draft Local Plan Policy P2 (p64) intention of “Making efficient use of Old Oak Sidings by: i) safeguarding the site for continued use as a waste management site with additional capacity; ii) supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. TITRA is fundamentally opposed to the continued use and development of the “Old Oak Sidings site – by which the OPDC means the Powerday waste site at Old Oak Sidings. This waste site was misconceived has caused odours for local people ever since. TITRA believes that Policy p2 i), ii), iii), continue the misconceived and foolish idea that waste sites can be maintained in the middle of residential. TITRA reminds the OPDC that Powerday company received a record fine of £1 million from the Environment Agency for its mismanagement of this site. TITRA believes TITRA believes that Policy p2 i), ii), iii), are unsound. Another solution to the waste management needs of Old Oak’s redevelopment must be found.
222	484	Local Resident	Stephanie	Hewett			P2	j)	Expansion of Powerday including an energy from waste facility - This suggestion of installing an energy from waste facility in our area is absurd and dangerous. The risks associated with this were fully explored only a few years ago by Ealing council when there was an equally ridiculous proposal to put an incinerator on the site adjacent to Stephenson St (now occupied by High Speed 2). Energy from waste facilities are not appropriate for an inner city area.
93	524	Residents Association			Wells House Road Residents Association		P2	j)	We also note that OPDC intends to safeguard PowerDay, which received record-breaking fines recently and is totally unsuitable to be located close to residential communities. Local communities have suffered years of acrid smells, plagues of flies and pollution from additional HGVs from PowerDay and we are quite frankly gobsmacked that any developer would consider building homes close to this waste site.
223	544	Local Resident	Eileen	Hannington			P2	j)	Below are the various objections proposed by TITRA of which I wholly endorse, in particular the expansion of Powerday; I live in Webb Place and my house is about 50mts away from the noise 24/7 of the recycling machines, the dirt and filth that is in the air that covers our windows, homes and cars and I dread to think of the damage to the children’s lungs from this disgusting company with their rats’ flies and seagulls searching for food.
223	551	Local Resident	Eileen	Hannington			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.

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223	566	Local Resident	Eileen	Hannington			P2	j)	TITRA rejects utterly the draft Local Plan Policy P2 (p64) intention of "Making efficient use of Old Oak Sidings by: i) safeguarding the site for continued use as a waste management site with additional capacity; ii) supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. TITRA is fundamentally opposed to the continued use and development of the "Old Oak Sidings site – by which the OPDC means the Powerday waste site at Old Oak Sidings. This waste site was misconceived has caused odours for local people ever since. TITRA believes that Policy p2 i), ii), iii), continue the misconceived and foolish idea that waste sites can be maintained in the middle of residential. TITRA reminds the OPDC that Powerday company received a record fine of £1 million from the Environment Agency for its mismanagement of this site. TITRA believes that Policy p2 i), ii), iii), are unsound. Another solution to the waste management needs of Old Oak's redevelopment must be found.
224	573	Local Resident	Alison	Brayshaw			P2	j)	Expansion of the waste management capacity of Powerday at Old Oak is a scary thought. We already have to live with the horrible smells, noise and health hazards since it opened and which continue on a daily basis.
225	631	Local Resident	Marta	Donaghey			P2	j)	I object in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
227	685	Local Resident	Jamie	Sutcliffe			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
28	728	Strategic Partner	Lucinda	Turner	Transport for London		P2	Policy, OON 5 and OON 6	TfL welcomes the opportunity to comment on the Old Oak North Development Framework Principles which has been included as part of the Evidence Base. TfL's comments are enclosed as an appendix to the main Local Plan response.
28	729	Strategic Partner	Lucinda	Turner	Transport for London		P2	Policy part d and OON 7	TfL supports the preferred option of a viaduct and potential new station at Hythe Road to enable improved North-South connectivity across the area. The benefits of this solution have been demonstrated through TfL's business case work and the public consultation carried out in autumn 2017 showed significant public support for the proposals.
28	730	Strategic Partner	Lucinda	Turner	Transport for London		P2	Policy part d and OON 7	The development framework refers to a new two-track viaduct as the OPDC preferred approach. TfL's current position is that the latest Hythe Road station and viaduct design (that has received Network Rail Approval in Principle) which included a three-track viaduct and station is the most preferable option to take forward. It provides additional connectivity, capacity and operational flexibility benefits in comparison to a two track viaduct and station design solution. This is particularly the case given the likely future increases in rail services on the West London Line. We have previously confirmed that this project is not fundable by TfL and highlighted the need to secure funding from other sources. In this challenging funding context we understand the need to consider alternative and lower cost delivery solutions such as a two track viaduct and station design. We are happy to work with you to look further at these. However, it is worth reiterating that as a new design, a two track viaduct and station would have to gain Network Rail approval through GRIP. There is no guarantee this approval would be provided and we believe issues such as timetable modelling could be a particular risk. Therefore it is important that until Network Rail approvals have been achieved nothing should be done to preclude the delivery of the currently approved design.
28	731	Strategic Partner	Lucinda	Turner	Transport for London		P2	Policy part f and OON6	Further work will be required to develop the final design for the potential new London Overground station at Hythe Road. The draft Local Plan suggests some design solutions. However, final station proposals and arrangements for the public realm will be developed through close working between TfL, OPDC and other stakeholders. TfL is pleased to note that the policy now refers to a 'potential' new station at Hythe Road
28	732	Strategic Partner	Lucinda	Turner	Transport for London		P2	Para OON7	We suggest that the supporting text should note that any approach in Old Oak North that does not include Hythe Road station must demonstrate how the appropriate levels of public transport accessibility, connectivity and capacity will still be achieved.
28	733	Strategic Partner	Lucinda	Turner	Transport for London		P2	OON 13	TfL is pleased to note that Park Road will not be designed as a through route for private vehicles.
107	883	Residents Association	Mark	Walker	TITRA		P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents, especially in the Old Oak Conservation Area, since it opened and which continue to the day of writing this response; it is outrageous that the OPDC and LBHF should seek to expand this site – another waste management option must be found.
107	888	Residents Association	Mark	Walker	TITRA		P2	j)	TITRA also condemns this plan's tactics such as calling the well-known Powerday site 'the Old Oak Sidings waste site' – which name no-one locally has ever used: this is a deliberate policy to confuse residents reading the documentation.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
107	900	Residents Association	Mark	Walker	TITRA		P2	j)	TITRA rejects utterly the draft Local Plan Policy P2's statement (page 63) that "buildings and the public realm will celebrate local heritage assets, including the Grand Union Canal and the Rolls Royce Building, and will positively address challenges presented by the surrounding railway infrastructure. A retained and appropriately designed Old Oak Sidings waste facility has the potential to play an important role in supporting both the construction and the future functioning of the area, by helping to manage waste and meet utility requirements." Old Oak Sidings waste site – which is the Powerday site, but this document doesn't say so – has been a source of health hazards and foul odours since it began operations, so it is highly inappropriate and misleading of the draft plan to say an enlarged site will "support" the local area within a heritage protection context. Local communities that have put up with pollution from Powerday know very well that London Borough of Hammersmith & Fulham should never have located the Powerday site by hundreds of residential homes, particularly those in a neighbouring borough and expanding it will adversely affect the local amenity and it will cause further health risks for many more people once new housing is completed.
107	901	Residents Association	Mark	Walker	TITRA		P2	j)	Furthermore, Policy P2's intention (p64) of: "Making efficient use of Old Oak Sidings by: i) safeguarding the site for continued use as a waste management site with additional capacity; ii) supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site" is equally unsound in that it will further harm the local amenity. TITRA objects strongly to it. TITRA is fundamentally opposed to the continued use and development of the Old Oak Sidings site – by which the OPDC means the Powerday waste site at Old Oak Sidings. This waste site was misconceived has caused odours for local people ever since. TITRA believes that Policy p2 i), ii), iii), continue the misconceived and foolish idea that waste sites can be maintained in the middle of residential. TITRA reminds the OPDC that Powerday company received a record fine of £1 million from the Environment Agency for its mismanagement of this site. TITRA believes TITRA believes that Policy p2 i), ii), iii), are unsound. Another solution to the waste management needs of Old Oak's redevelopment must be found.
228	912	Local Resident	Pablo	Navarrete			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
114	923	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		P2		2.6. We object in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
114	960	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		P2		11.7 Our Group's view on the likelihood of construction of a Hythe Road Overground station is that this prospect is becoming less likely by the day. In our own earlier meetings with London & Regional Properties (Cargiant's development partner) their Development Director made it clear to us that as developers of this 43-acre site, they would contribute to costs of a viaduct to open up the site but not to costs of a new station (estimated by TfL at £198m).
114	961	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		P2		11.8 There is no information in the 19.2 OPDC Local Plan of the implications for PTAL levels in Old Oak North and Scrubs Lane were the Hythe Road station not to be built. Common sense suggests that the planned 2026 opening of the Old Oak Common HS2/Elizabeth Line interchange will not meet the commuter travel needs of a large proportion of the planned new homes at Old Oak - apart from those with jobs in Central London or near Elizabeth line stations to the west. 11.9 The justification for Local Plan policies underpinning residential development at average density levels of 600 units/hectare at Old Oak North is now highly questionable. OPDC is showing no recognition of the need to revise downwards its housing targets in the light of responses to the 19.1 Local Plan and the passage of events. This surely cannot be sound planning?
95	993	Local Resident	Mark	Walker			P2	j)	I think Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings is badly flawed. The draft Local Plan commits to: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. This is an entirely misguided policy. The Powerday waste site is completely out-of-scale with and inappropriate to a residential area and so has caused pollution issues since it opened (and which problems continue to this day of writing) so why should a Local Plan seek to extend the pollution risks to new, high-density housing areas that are the cornerstone of your plan? Hammersmith & Fulham should never have allowed the Powerday site and sanctioned inadequate control for it. It is outrageous that the OPDC and LBHF should now be seeking to expand this polluting site – LBHF must urgently find another waste management option to meet its apportionment target under the London Plan.
51	998	Local Resident	Stuart	McCaffer			P2	j)	I am writing to object to your proposed plans to not only keep but enlarge Powerday, the waste management site at Old Oak. This is an absolute disgrace as a plant like this should never have been aloud so close to housing in the first place but it just shows in what sort of contempt we residents are held that you could, in the 21st century, think that keeping this noisy, stinking facility open never mind expanding it was a viable idea. This is a company that has no regard for the harm and misery it makes to this area let's think back couple of years is it my imagination or were this same company not done for illegally processing asbestos. I wouldn't trust them as far as I could throw one of their stinking skips.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
50.b	1017	Statutory Consultee	Donatella	Cillo	Environmental Agency		P2		Policy P2 and Old Oak North Development Framework Principles document As mentioned in our comments above, we are concerned that for the Old Oak North development area, you have delved deeper into the traditional grey infrastructure requirements for elements such as roads, viaducts and bridges and connectivity than you have into environmental and Green Infrastructure (GI). We acknowledge that you have spatially allocated significant areas for new parks which is positive. However, given the environmental constraints, such as lack of drainage capacity and high surface water flood risk in areas of Old Oak North, we are concerned that there is, no strategic SuDS allocation, or a strategy for the provision of street SuDS. Examples of SuDS in this setting might include bio-retention tree planters in walkways, permeable roads, or features such as rain gardens which will also provide amenity value in addition to biodiversity and water management benefits etc
50.b	1018	Statutory Consultee	Donatella	Cillo	Environmental Agency		P2		We are also concerned that the amended policy P2 has been weakened from the previous version by removing the requirements for proposals to: <ul style="list-style-type: none"> embed green infrastructure along Old Oak High Street and within other streets minimise the impact on the sewer network and reduce the risk of flooding by implementing sustainable drainage systems across Old Oak North including connecting to the Grand Union Canal, and new water infrastructure where feasible We recommend the above requirements are re-included in policy P2.This would make your local plan more in line with paragraphs 103, 109 and 110 of the National Planning Policy Framework (NPPF) 2012.
50.b	1019	Statutory Consultee	Donatella	Cillo	Environmental Agency		P2	j)	We also have some concerns with the reliance you are placing on increasing waste throughput at the Old Oak Sidings waste management facility. This has potential to have amenity and environmental impacts which will need to be carefully assessed. This will become even more important as the area begins to transform and you should consider how you can use planning conditions and obligations to ensure that the new residential development is designed to mitigate any impacts of the permitted operation, following the agent of change principle in the draft London Plan and your revised version 2 local plan. Please note this was not mentioned in our response to the previous version of your local plan, as at the time of Regulation 19 (1) the Old Oak North Masterplan was not included within your supporting studies informing the strategy and policies in OPDC.
35.b	1036	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	P2		The Policy and supporting text (and in turn the OONDFP) should place greater emphasis on the early delivery of the new bridge link to Willesden Junction Station. This can happen as an early phase of the regeneration, which will significantly improve the PTAL rating of Old Oak North in its own right and assist in opening up development through the delivery of the EMR site to commence within the 0-5 year timeframe.
233	1094	Local Resident	Pendle	Harte			P2	j)	The proposed expansion of Powerday in particular is a problem: it is already a source of smells, pollution, noise and flies for local residents – as well as traffic and fumes. As a mother of two children, it's important to me to object to anything that impacts negatively on their health.
233	1096	Local Resident	Pendle	Harte			P2	j)	TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
101	1102	Local Resident	Jason	Salkely			P2	j)	I object in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
56	1121	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2		Public open spaces and station squares should promote natural green landscaping, trees etc. where possible to create more attractive environments, rather than swathes of hard landscaping. Maintenance and management plans for public open spaces must be agreed with boroughs and any proposals must not place any additional burden on the council's budget.
56	1126	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2		Welcome the inclusion of a reference to supporting the delivery of new multi-functional canal basins and waterspaces where they provide amenity, leisure and sustainable drainage functions, although see comments on Policy EU3 on the use of direct discharge of surface water to the canal as the priority SuDS measure.
56	1127	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2		Add a new bullet point under the heading Green Infrastructure & Open Space as follows:- "Ensuring highest quality of environmental design of development to address micro climate, air pollution, noise and urban heat island effects."
56	1128	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2	l(i)	I i) add reference to policy D7 (also wherever there are references to building heights in other cluster policies)

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56	1129	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2	Para OON.23	<p>The Council requests greater flexibility in terms of the preferred location and scale of any nursery provision at this stage. The Council is aware that the market for childcare provision is uncertain, financial feasibility and viability means providers frequently enter or leave the market.</p> <p>The proposed supernursery also may not be the preferred size of any provider; furthermore it may be more appropriate to be located in multiple or alternative locations across the Old Oak North site or as part of a community hub with other uses.</p> <p>For these reasons, needs for nursery provision will need to be monitored on a regular basis and any allocations should be discussed with the Council, particularly on any further detailed work as part of any area based supplementary planning documents which may come forward.</p> <p>Suggested changes to text:</p> <p>“A significant amount of social infrastructure will be required. Current population and child yield projections indicate that there is a need to deliver one 4-form entry primary school, one health hub, nursery provision, one community hub and one sports centre in across the Old Oak North area. These requirements are based on current population and child yield projections, which could change over time thereby impacting on the size and type of facilities required (see Policy TCC4)...”</p> <p>Amendments also apply to Policy P1: Old Oak South (Para 15) and Policy TCC4.</p>
56	1130	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2	b	<p>LBHF do not support the reference to Hythe Road Overground Station as “potential”.</p> <p>Given OPDC’s preferred approach for Old Oak North is to deliver the West London line on a raised viaduct which would support delivery of a new station at Hythe Road. LBHF consider the reference to Hythe Road Station as ‘potential’ is not consistent with the preferred approach which OPDC is pursuing in its Local Plan.</p> <p>Change the references to Hythe Road Station from “potential” to “proposed” in Policy P2 and throughout the Local Plan.</p>
56	1131	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2	b	<p>Policy P2 (b) states that a range of town centre uses will be delivered along key routes in Old Oak North including the delivery of a Grand Union Canal food and beverage quarter.</p> <p>Food and beverage uses should be restricted to the clusters of activity that are located along the canal as the canal corridor has many functions that should be protected or provided such as open space, recreation, biodiversity, quiet spaces and other commercial uses.</p> <p>These types of uses (A3/A4) will need to be carefully managed and an appropriate balance struck against the many other functions and uses for the canal.</p>
56	1132	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2	i	<p>Support the safeguarding of the Old Oak Sidings (Powerday) waste site over the Local Plan period in order to meet LBHF’s London Plan waste apportionment target.</p>
56	1133	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P2	Para OON.23	<p>The EMR waste management site sits within Old Oak North and is allocated in the Local Plan for re-development, with the potential for 1,100 homes and 1,100 jobs.</p> <p>There appears to be no mention of the need for compensatory site provision in line with Policy EU6 if waste capacity at EMR is proposed to be lost to other uses.</p> <p>Given this is necessary in order to facilitate regeneration of the site for housing/jobs, this requirement should be mentioned in this policy (Para 23).</p>
234	1301	Local Resident	Elaine	Gristock			P2		<p>Policy P2 proposes expansion of the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened. The OPDC is aware of this. This plan for expansion is totally unacceptable.</p>
103	1333	Local Resident	David	Turner			P2	j)	<p>Please find below my objections to the latest OPDC plan. I especially object to the idea of keeping and expanding recycling site Powerday. This site has caused problems in the past, including the mishandling of asbestos, that locals will be taking to court.</p>
103	1339	Local Resident	David	Turner			P2	j)	<p>TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.</p>
89	1349	Local Resident	Nicky	Guymer			P2	j)	<p>TITRA objects in the strongest terms to Policy P2 which wants to expand the waste management capacity of the Powerday site at Old Oak Sidings, specifically: i) safeguarding this site for continued use as a waste management site with additional capacity; ii) enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area; and iii) supporting the delivery of an integrated utility hub on the site. The Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.</p>
82	1402	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		P2		<p>6.7 Our Forum’s view on the likelihood of construction of a Hythe Road Overground station is that this prospect is becoming less likely by the day. In our own earlier meetings with London & Regional Properties (Cargiant’s development partner) their Development Director made it clear to us that as developers of this 43 acre site, they would contribute to costs of a viaduct to open up the site but not to costs of a new station (estimated by TfL at £198m).</p>

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82	1403	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		P2		6.8 There is no information in the 19.2 OPDC Local Plan of the implications for PTAL levels in Old Oak North and Scrubs Lane were the Hythe Road station not to be built. Common sense suggests that the planned 2026 opening of the Old Oak Common HS2/Elizabeth Line interchange will not meet the commuter travel needs of a large proportion of the planned new homes at Old Oak - apart from those with jobs in Central London or near Elizabeth line stations to the west. 6.9 The justification for Local Plan policies underpinning residential development at average density levels of 600 units/hectare at Old Oak North is now highly questionable. OPDC is showing no recognition of the need to revise downwards its housing targets in the light of responses to the 19.1 Local Plan and the passage of events. This surely cannot be sound planning?
110.b	1452	Community Group	Robin	Brown	Grand Union Alliance		P2		Overwhelming extent of high buildings averaging 10 storeys, some blocks of 15 storeys and above, together with taller elements (source: Transport & Old Oak North 27 June 2018 Presentation event).
110.b	1453	Community Group	Robin	Brown	Grand Union Alliance		P2		P2 b): has deleted "- Contributing to the provision of a range of homes across the place including: focusing a higher amount of family-sized housing around Old Oak Gardens and Stamford Gardens; and focusing a higher amount of smaller housing units around the Rolls Royce Building." Understand that policy should not necessarily be too prescriptive in locational terms and should have a degree of flexibility, we believe it is important in the development of a sustainable and lifetime neighbourhood to retain wording that requires a range of housing from family sized to small units in policy (not only in Vision). Reinsert/ insert "contributing to the provision of a range of homes across the place, including family-sized housing to smaller housing units".
110.b	1454	Community Group	Robin	Brown	Grand Union Alliance		P2		Parks: Oak Park because of its North-South alignment may receive noonday/lunchtime sun lighting, an advantageous feature for parks in Major Town Centres when peak usage occurs. However, Canal Park because of its Northwest- Southeast alignment would only have that advantageous feature up to end of plan period. This is when the Elizabeth Line Depot to the south and south west of Canal Park is expected to be developed intensively and high. This may occur earlier if Transport for London is so persuaded by the efforts of the OPDC to secure earlier delivery (see OOS.4). Both parks, including the canal are likely to be detrimentally hemmed in by the sheer height, massing and scale of development required to deliver on the policy specified new jobs and new homes as illustrated within the supporting document Old Oak North Development Framework Principles.
110.b	1455	Community Group	Robin	Brown	Grand Union Alliance		P2		Connections: the paucity of connections, for example, no linking bus service with Harlesden from Old Oak North, not even via Old Oak South of Scrubs Lane, is a clear indicator that the plan-making approach to Old Oak does not integrate and harmonise with its surroundings. The achieving of a beneficial relationship between Harlesden Town Centre and Old Oak will be inhibited to the detriment of both.
110.b	1456	Community Group	Robin	Brown	Grand Union Alliance		P2		Oak Park has an important route across between Hythe Road Station, if opened, and Willesden Junction, but there are concerns over the security and the fear of crime for users crossing the park at night.
110.b	1457	Community Group	Robin	Brown	Grand Union Alliance		P2		Access to Old Oak Station – Connectivity: adequacy of surface access to Old Oak Common Station: For the plan period it is envisaged that a potential principal access route that would use Park road from Scrubs lane would not be a through route for private vehicles. This is likely to result in the diversion of those seeking Old Oak Common Station around Old Oak through Harlesden Town Centre. Furthermore, surface access to Old Oak Common station from Old Oak North awkward and unappealing across and alongside railway lands. The approach to road, street and route planning is in a sense parochial as it considers Old Oak and Park Royal largely in isolation from its surroundings and the wider highway network. This wider network is exploited to provide access to and from three large scale development and intensification of Old Oak and Park Royal, but without the necessary measures to mitigate additional strains placed on the wider network. Nor is it apparent that the network within Old Oak and Park Royal is designed to relieve pressures beyond its boundary, by say, considering new or improved through routes through these areas. For example, by connecting the new roads in new development areas together to form a more direct link between Acton Lane, Harlesden and the Harrow Road, College Park.
110.b	1458	Community Group	Robin	Brown	Grand Union Alliance		P2		P2 k): Propose that warehouse buildings next to Rolls Royce building be retained and repurposed to provide active uses such as arts centre, restaurants etc., as well as recognising the industrial heritage of the area, as has been successfully created at Hackney wick.
110.b	1459	Community Group	Robin	Brown	Grand Union Alliance		P2		P2C1 Grand Union Square Cluster Policy: Its vision started so: "The cultural heart of Old Oak North, Grand Union Square will be an attractive city square contributing to the Grand Union Canal Local Park. The square will celebrate the relationship between the canal, Old Oak High Street, Hythe Road Station and the Birchwood Nature Reserve". But the entire policy and text has been deleted. It is accepted that what would have been Old Oak High Street has a diminished function and status now as Old Oak Street. Policy SP6 is indeterminate as to whether it is Old Oak North or South that given support for a new Cultural Quarter. Unless the catalyst uses that Policy SP6 a) ii and para OON.10 describe materialise, Old Oak North will have 'lost its heart'.
120	1627	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		P2		HNF recognises the severe constraints on the site emanating from existing uses, mainly railway lines and workshops. Previous versions of the plan had shown all vehicle, or at least public transport, over the west coast main line with a connection to either Station Approach or the Harrow Road. The new plan, promoting Park Road as the principal route into an out of the development will mean that the only eastern access will be from Scrubs Lane, an area with access already challenged by the recent approval of tall buildings. HNF considers that this will lead to substantial increases in traffic at the Scrubs Lane/Harrow Road junction which should be avoided. Moreover the nearby junction of Harrow Road and Furness Road is already the subject of redesign due to the high number of accidents at a crossing point to Willesden Junction Station.
120	1628	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		P2		HNF considers that a substantial vehicular link is still required between the developments and Willesden Junction Station.
120	1629	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		P2		Park Road is described (OON.13) as being suitable for all modes of transport, obviously vital during the development/building phase. However it is also described as not a through route for private vehicles. Quite how this can be achieved is unclear. Normal traffic restrictions work in reverse, keeping out large vehicles while being permeable to cars and taxis. While the number of residents in Old Oak North with cars is likely to be small, the consequence of this will be the requirement for very large numbers of service and delivery vehicles. If through access is restricted then vehicle will have to exit the area (e.g. to the east) and travel through Harlesden town centre to re-enter in the west. This seems at variance with policy TCC1

P3 Grand Union Canal

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
17.b	255	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		We would however reiterate that the Trust welcomes the recognition given to the Grand Union Canal as being central to the future development of the area.
17.b	256	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3	Vision	Vision As previously comment we generally welcome the inclusion of Policy P3 which brings together sensitivities and opportunities related to the canal, its use and a vision statement for the canal.
17.b	257	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3	Vision	We note that the original vision, comprising some five paragraphs, has been deleted and replaced with a single paragraph: "The Grand Union Canal will be a defining feature of the OPDC area, shaping the character of both Old Oak and Park Royal. Moorings, open spaces and canalside activities will support its role as a lively leisure and recreation destination. The canal's role as a transport corridor will also be optimised, while ensuring that its ecology and heritage are conserved and enhanced." Whilst the broad vision and recognition of the canal as a defining feature of the OPDC area is generally welcomed, we do wonder if this goes far enough. The vision fails to recognise the potential role of the canal within the local community and in particular the contribution it can make to health, wellbeing and happiness. It is considered that the vision could be amended to include reference the creation of a cohesive and sustainable community based on economic, social, physical and mental well-being.
17.b	258	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		Building Height The Trust has previously expressed concerns about uniform 6 to 8 storey development along the canal and the canyoning effect this will create with resulting impact on the amenity of canal corridor not least in term of shadowing and air quality. Whilst we note that some changes have been made to the plan in respect of building height, there has been no change in respect of reference to buildings of 6-8 storeys fronting onto the Grand Union Canal as such our original comments stand. Development adjacent to the canal should avoid the creation of "canyons" by providing both variety in terms of height (with a height of 4 storeys being considered more appropriate in close proximity to the waterfront) and breaks in frontage
17.b	259	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		Bridges We note that reference to the need for Highways Authority approval has now been added. Our previous comments in respect of guidance based on agreed design principles for new bridges has not however been addressed.
17.b	260	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		Land Uses - Moorings We note and welcome changes to paragraph c, which has been expanded to include education, cultural and commercial moorings along the canal and the deletion of reference to specific locations.
17.b	261	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		Land Uses - Moorings We note the new reference in paragraph b to 'supporting overlooking, security and safety'. It will be important to ensure however that this is in the context of appropriately considered and designed development and does not adversely impact on moorings.
17.b	262	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		Protection of Waterway We previously suggested that additional points should be added to the 'infrastructure' section to make it clear how the existing waterway will be protected during the life of the plan, including the protection of the structural integrity of the canal and the land stability of the adjacent land. The relevant infrastructure paragraph has now been removed from the policy. The tracked changes document indicates that this is to avoid repetition with the "Public Realm "section. There is however no reference within this paragraph to the long-term protection of waterway and as such, our original comments now stand in respect of the public realm paragraph.
17.b	263	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		Protection of Waterway We note and welcome reference in para 10 to development, contributions being sought to towards environmental enhancements along the canal.
17.b	264	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		Public Realm & Movement We note that a number of changes have been made to this section of the policy. As previously commented however we believe that the focus should be on recognising the canals value as a shared-use Quietway and supplementing it with additional east-west pedestrian and cycle routes
17.b	265	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		We would question why the "infrastructure "section of the policy has been deleted and in particular reference to the potential use of canal water for heating (which could also have referenced cooling). The tracked changes document indicates that this is to avoid duplication with the public realm and movement section of the policy, but neither of these include such a reference. The supporting text (para GUC.16) which refers to heating and cooling is however retained.
17.b	266	Strategic Partner	Debbie	Fifer	Canal & River Trust		P3		We would also question why reference to a water space strategy has been deleted.
92.b	436	Community Group	Melanie	Whitlock	The Hammersmith Society		P3		Policy P3 Grand Union canal -Heritage and character k) m) i. Add to list "heritage canalside warehouse buildings at 44 Hythe Road", as above.
19.b	488	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		We are pleased to see the Local Plan recognises the Grand Union Canal as a defining feature of the OPDC area, shaping the character of both Old Oak and Park Royal and providing a valuable green-blue, east-west link.
19.b	489	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		We accept that at present the canal is underutilised and agree the OPDC development provides the opportunity for significant enhancement. However, having recognised its importance, it is disappointing to find the Local Plan lacks a coherent vision for the future of the canal corridor and its potential role as a vital part of both the OPDC community and the broader metropolitan area. In our view this vision should include a bolder approach to the enhancement of the canal corridor and the potential benefit it brings to public health and wellbeing. We comment below on the changes to the Local Plan and our specific concerns. We then propose a bolder vision for the future of this valuable asset.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
19.b	494	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		In the previous version of the Local Plan (2017), the key provision of green space along the canal corridor was a Linear Park extending through Old Oak and continuing westward for approximately 0.5 km into the Channel Gate/Park Royal area. In our response to the first Regulation 19 Consultation we welcomed this concept, suggesting it be extended through the entire length of the OPDC area. Unfortunately the revised Local Plan retreats from this vision and removes all reference to a Linear Park. In our view this is a retrograde step, which despite good intentions, fails to recognise the value of the Grand Union Canal.
19.b	502	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		We welcome the Local Plan's recognition of the importance of moorings in supporting the historic character of the canal, in meeting housing need and providing space for employment and leisure activities. We also welcome the intention to create new permanent and temporary moorings along the length of the canal with a focus at accessible locations, including those listed in Policy P3: Grand Union Canal.
19.b	503	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		When looking at the space needed for cycling and walking routes along the canal, the continuing need to give access for boaters and other users must be borne in mind. In particular, space is needed to safely and securely moor boats and give safe and uninterrupted access thereto. Section 2 above mentions the friction between fast moving cyclists and pedestrians in the confined space of a shared route. With the towpath being close to the water's edge, the same friction arises between cyclists and canal users, including those handling and mooring boats and gaining access to moorings. With adequate space these various activities can safely coexist and gain mutual enjoyment from the waterway.
19.b	505	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		As noted above, we fully support the Local Plan in terms of its recognition of the Grand Union Canal as a defining feature of the OPDC area. However, we urge the adoption of a bolder and more coherent strategy for the improvement of the canal corridor both in terms of the extent of green space and the infrastructure needed to support the use of the canal corridor by all.
19.b	506	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		In 2011 Sir Terry Farrell produced a planning document for the London Borough of Hammersmith and Fulham entitled 'A Vision for Park Royal City'. This identified the potential of Old Oak and Park Royal and offered a vision for future development. One of the key components of this vision was existing and proposed green connections, specifically the creation of a Linear Grand Union Park (please see attached diagrammatic layout). We strongly support this vision as offering the best way forward to both preserve the historic character of the canal and allow its enhancement to meet future needs.
19.b	509	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P3		To achieve the above, and based on Sir Terry Farrell's 'A Vision for Park Royal City', we urge OPDC to return to the concept of a Linear Park along the canal corridor. This was shown in the 2017 version of the Local Plan for part of the OPDC area and we suggest it should be adopted for the entire length of the canal within Old Oak and Park Royal.
50.b	1020	Statutory Consultee	Donatella	Cillo	Environmental Agency		P3		The Water Framework Directive (WFD) is now mentioned within supporting paragraph GUC.9. However, we recommend that the WFD classification of the Grand Union Canal is provided within the policy supporting paragraphs. We also suggest policy P3 is strengthened by referencing the requirement for new developments to prevent the deterioration of the Grand Union Canal waterbody status and where feasible to contribute to raising its status. This is in line with the requirements of the WFD and would make this policy more consistent with paragraph 110 of the NPPF.
105	1072	Community Group	Del	Brenner	Regents Network		P3		The historic Grand Union Canal should be celebrated as the centrepiece of the OPDC Development rather than exploited as the setting for a gathering of bulky and aggressive glass and concrete structures competing to be as close as possible to the waterway.
105	1073	Community Group	Del	Brenner	Regents Network		P3		OUR canal It seems that a text correction has not been fully dealt with. Although OPDC no longer attributes the ownership of the Grand Union Canal to the Canal and River Trust Limited in the 'Vision' of Policy P3, it incorrectly attributes CRT Limited as landowner of the GU Canal in GUC 17. However, to boost the interest in the Grand Union Canal it would be effective to promote the ownership of the canal by the public in perpetuity (Government, Transfer of Functions 2012). It would be a strong point to make, so why is it avoided? There may be a number of public facilities in the OPDC area, but perhaps as a right of access or a dedicated facility, such as a park or open space. These are solid and indisputable functions. However, this does not compare with the full ownership by the public (the nation) of the important heritage asset of our canal network. A bit more respect is needed.
105	1074	Community Group	Del	Brenner	Regents Network		P3	Vision	A more enlightened vision - nearly It is encouraging that the Grand Union Canal section of the revised Local Plan (Policy P3, Vision) opens with the bold statement that the Grand Union Canal "will be the defining feature of the OPDC area, shaping the character of both Old Oak and Park Royal". If only that was carried out as the designated character and heart of the overdevelopment of the area, and that the GU Canal was a centrepiece. The canal need not be revered, nor should it be, as it has a place with the community while not disclaiming its practical and strategic function as a transport route. That begs the question as to why the second sentence of the Vision begins with 'moorings' as if that is a key function of a transport network. The operation of navigation of the canals may be gentle and well mannered, but it certainly should not be characterised as static, nor employed as a housing estate. Delete 'Moorings' from the all-important Vision (line 3), and replace with 'Boats and transport' for instance, to correctly describe and interpret the strategic importance (as stated in the London Plan) of the miles of canal network sitting there quietly at the moment, waiting to be used and valued.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
105	1075	Community Group	Del	Brenner	Regents Network		P3		<p>Unsuitable 'Land uses'</p> <p>The favourable future of the Grand Union Canal is further compromised in Policy P3 with inappropriate and ill-advised 'Land uses' where inappropriate support is given to 'activation' of the Grand Union Canal and the land alongside.</p> <p>It looks very much like the source of the 'activation advice' to OPDC comes from Canal and River Trust Limited and is a throwback from the dreaded days of the flawed British Waterways who used 'activation' as a cover-all excuse for numerous problems. It was a serious error of Government to transfer a large section of that failed BW management into the Canal and River Trust Limited.</p> <p>The last thing that our canals want is 'activation'. This generally means non-canal-related activities and construction around and along the waterway, such as is suggested in Policy P3 'land uses' such as active frontages, areas of high activity, residential uses with positive frontages, overlooking, and supporting infrastructure for residential and commercial interests. Note that CRT Limited have suggested boat moorings which is a static situation, but may be in line with the BW style excuses.</p> <p>The last thing that our canals want or need is 'activation' of this sort.</p>
105	1076	Community Group	Del	Brenner	Regents Network		P3		<p>Alive and busy</p> <p>Our canals in general, and the Grand Union Canal in West London in particular, have their own character and heritage life as they have done for two hundred years. At its busiest periods the Grand Union activity was considered "immense" with the trade amounting "to near £160,000 per annum" which is equivalent to about £16.8m annually these days.</p> <p>It was certainly not a relaxed existence, as a lot of hard work and effort is involved. However, all this 'activity' was carried out in a calm and collected manner, which describes the character and essential qualities of water transport of this kind.</p> <p>What a nice environment to work hard in!</p>
105	1077	Community Group	Del	Brenner	Regents Network		P3		<p>Wide range of uses</p> <p>This is the sort of liveliness that would be welcome in the future for the Grand Union Canal in the OPDC development. The planning for the development should encourage the use of canal transport through the area by organising the transfer of road transport on to the canal where possible. That would include deliveries to businesses, shops and restaurants for instance, removal of waste and recyclates, building and construction materials, and of course development of a passenger transport service and leisure cruises.</p> <p>This obviously means that there are offices, housing and flats, cafes and restaurants and so on, along the route of the canal, but they should not dominate the waterway and have the unwelcome 'active frontages' that are sadly promoted.</p>
105	1078	Community Group	Del	Brenner	Regents Network		P3		<p>The starting point</p> <p>A familiar expression used in waterway planning is that "the starting point for consideration of development and use of the waterways and land alongside must be the water. The water is the unique aspect".</p> <p>This has been promoted in the London Plan, for instance, as well as in a similar manner in local plans. It is surprising that in a more recent planning document such as the OPDC Local Plan (revised) that this positive (and obvious) direction is not explicitly expressed, particularly as the Grand Union Canal runs through the centre of the area and is a prominent asset.</p> <p>A further consideration is that the canal is designated as 'open space' and protected in the same manner and extent as a park.</p>
105	1079	Community Group	Del	Brenner	Regents Network		P3	GUC.11	<p>Waterway infrastructure and facilities</p> <p>There is a large canal basin on the Grand Union Canal at Scrubs Lane and behind the Rolls Royce building. It is still there intact, but filled in, but it would not take a lot of effort to re-excavate it and bring it back into regular use. It is an important heritage asset for the area and the canal, and ideal as a centre for water buses and water transport.</p> <p>The historic basin is clearly illustrated in an aerial view in the OPDC Heritage Listings (February 2018, above) although the OPDC Planning Team has not clearly identified it, nor mentioned it in the Draft Local Plan as a potential important waterways asset. This is in spite of the Local Plan stating that an opportunity is provided for new water spaces and basins (GUC 11).</p>
105	1080	Community Group	Del	Brenner	Regents Network		P3		<p>A great deal more attention should be given to develop facilities and infrastructure for the optimisation of water transport on the Grand Union Canal. This could include water bus and passenger service stops, and waterside areas for loading and delivering goods and materials on a regular basis. Note that wharves are not required so long as there is ample space for moving push-cages around and unloading pallets and the like, and with close access to the road network. Also cranes are not required as the new fleet of freight boats will have their own lifting gear just as delivery lorries do these days.</p> <p>Provision for well developed water transport (commercial and passenger) must be supplied at the planning stage, and well developed details must be included in the Draft Local Plan.</p>

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105	1081	Community Group	Del	Brenner	Regents Network		P3		<p>The GU towpath is not suitable as a cycleway It is welcome that a more circumspect study of cycling on the GU Canal towpath (Public Realm, Walking and Cycling Strategy, June 2018, Page 21) does not designate the canal towpath as a cycle route, or a 'cycle highway' as has frequently been irresponsibly promoted by the OPDC Planning Team and others. The towpath is shown as a 'shared path'. This requires certain conditions to be stipulated – and enforced.</p> <p>At a recent GU Alliance meeting members of a cycle organisation stated clearly that they did not want to use a shared path as a cycle route as pedestrians have priority.</p> <p>There is no necessity for the towpath to be used as a cyclist's route as it is at present, because there is a wide range of alternative, and many more suitable routes – as the map clearly shows.</p> <p>Note that the mentioned 'status' of the canal towpaths being a 'designated cycle route' is not correct. It is not an official classification, and so cannot be implemented (in legal terms).</p>
105	1082	Community Group	Del	Brenner	Regents Network		P3		<p>Improve the cycle routes A great deal more effort (and finance) needs to be put into improving the OPDC road network for cycles, just as is being carried out throughout London, and in particular in Central London.</p> <p>Cycling, and in particular cycle safety, is very well supported, and the developments and improvements have been widely welcomed. Funding for cycling improvements, especially related to safety, is fairly readily available these days.</p> <p>A detailed survey is needed of the cyclists who use the towpath at present. The findings may reveal that there are not very many long distance cyclists passing through the area. It is considered that they are just the sort of speed cyclists that would not be welcome on a shared path. Thoughtful planning is required to make diversion routes available, and clearly signposted.</p>
105	1083	Community Group	Del	Brenner	Regents Network		P3		<p>Pedestrian safety Not only is cyclist safety of great importance, but pedestrian safety on the canal towpath is also a top priority. The answer should be provided to the question of why are there so few pedestrians using canal towpaths, and family groups with buggies and toddlers and elderly people. OPDC will know the answer, just as many residents know, that it is because of the cyclists! This is a common issue on the towpaths throughout the canal network in London, and the same problems are found on the canals around the country.</p> <p>OPDC must respond in a competent and professional manner, rather than side step the issues, and deal with the pedestrian/cyclist situation in a fair and reasonable way.</p> <p>Note: Further development of the available network for cyclists (as shown on the above map) needs to be carried out – for everyone's sake.</p>
105	1085	Community Group	Del	Brenner	Regents Network		P3		<p>A travesty It is very irresponsible for the OPDC Planning Team to publish this incorrect and totally misleading illustration in a Local Plan document (Public Realm, Walking and Cycling Strategy, June 2018, Page27).</p> <p>The towpath would not provide a wide and open highway, and should never look like this with painted scenery rather than vegetation! UGH! It is deliberately misleading.</p>
110.b	1460	Community Group	Robin	Brown	Grand Union Alliance		P3		GUA.7: as for southern towpath [see Policy P3 g i)], the northern route should have segregated cycling route where feasible. This should be specified here in the text and preferably in Policy P3 h).
110.b	1564	Community Group	Robin	Brown	Grand Union Alliance		P3		The Grand Union Canal is a unique resource, a key identity to much of the area, while remaining almost hidden. A plan and designs for the areas adjacent to the canal should treat this as a special district, possibly creating a string of "villages" with local amenities, and a significant series of locations for good quality grouped housing, and new life and activity on the canal itself.

P4 Park Royal West

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
118	171	Planning Consultant	Rory	McManus	Turley	Ashia Centur Limited	P4		<p>It is acknowledged that specific reference has now been made in the draft Local Plan under Policy P4: Park Royal West as follows: Twyford Tip, if viable and deliverable, represents a significant opportunity to provide additional industrial floorspace/ jobs as it is currently vacant land; it should be noted that there is an extant planning permission for non compliant SIL uses on this site. The site is adjacent to the Twyford Waste and Recycling Centre which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6). Reference is now made to the fact that the site benefits from an implemented planning permission for a major mixed use development which was omitted from the previous draft.</p>
118	172	Planning Consultant	Rory	McManus	Turley	Ashia Centur Limited	P4		<p>The extant planning permission was granted for a wide range of uses in 1993 (small scale Class A1/A3 retail uses, Class C1 hotel (including ancillary health club and conference facilities), Class D1 cultural / exhibition centre, Class D2 leisure uses including cinema and other Sui Generis uses including casino, theatre, nightclub and television centre) prior to the designation of the site within Strategic Industrial Land. It is the case that the SIL is not compliant with the consented uses rather than the extant planning permission "for non compliant SIL uses on the site". It is contended that the consented uses in themselves are compatible with neighbouring sites which are designated as SIL and would not prejudice the successful operation of these neighbouring SIL sites.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
118	174	Planning Consultant	Rory	McManus	Turley	Ashia Centur Limited	P4		<p>In response to the above statement and for the purposes of clarity and completeness we reiterate headline considerations below which have been previously made in our earlier representations which respond to the above statement. Compelling reasons have been previously provided setting out why our client's site should be removed from the proposed Strategic Industrial Land (SIL) designation and should be identified as a site allocation. The reasons include:</p> <ul style="list-style-type: none"> • The planning permission is extant (92/0009) and this is confirmed through the grant of a Lawful Development Certificate dated 19 December 2007. • It is significant that the site is clear and is in the single ownership of Ashia Centur Limited and does not require any further land assembly. Most sites within the OPDC are in multiple ownership and deliverability is complex. • The implemented planning permission comprises the following employment led uses which should be reflected in a specific site allocation: <ul style="list-style-type: none"> – Small scale Class A1/A3 retail uses – Class C1 hotel (including ancillary health club and conference facilities) – Class D1 cultural / exhibition centre – Class D2 leisure uses including cinema – Sui generis uses including casino, theatre, nightclub and television centre <p>Additional uses that are considered appropriate and complementary to the approved uses. These should also be included in the site allocation :</p> <ul style="list-style-type: none"> – Larger scale Class A retail uses (A1-A5) – Class B1a Office – Class B1b Research and Development – Class B1c Light industrial – Class C3 – Residential units <ul style="list-style-type: none"> • The site does not contribute towards the provision of industrial uses within the Opportunity Area – this has been the case for the past 25 years. • The site's removal from the Park Royal SIL (Broad Location) would not compromise the integrity or delivery of the remaining SIL land and neither does the extant permission prejudice the successful operation of neighbouring industrial uses within the Park Royal SIL. As is apparent, it in any event will not be delivered for SIL purposes as the development the subject of the permission will be undertaken. • The site is located at the western extremity of the Opportunity Area and Park Royal SIL and is not a key integrated site within the SIL. The site is bound to the west by the North Circular Road, Abbey Road to the north and canal to the south and it therefore forms an independent island site that is not linked with the remaining SIL. • The site with its extant consent and mix of uses including retail, hotel, cultural, leisure and sui generis uses will act as a buffer / transition zone between the traditional, noisy and dirty industrial activities found to the east / south in the SIL and the mixed use character to the north and west, including substantial areas of residential beyond the North Circular Road. The land uses being implemented by the extant consent, whilst being significant employment generators in their own right, are complimentary to both the industrial uses in the main SIL and the mixed-use character to the north and west. • The site is considered to be similar in character to the Brewery Cluster as designated within the draft Local Plan as an Opportunity Site (Number 27). It is considered that both sites share a number of similar attributes: <ul style="list-style-type: none"> – The Brewery Cluster is focussed around a key point of entry into the industrial area from Park Royal and Hanger Lane rail stations, whereas our client's site is a key point of entry from the north west from Stonebridge Underground and Overground Stations; – Both sites can provide a transition zone between more traditional dirty and noisy industrial uses in the heart of the SIL and more neighbourly employment generating uses at these fringe gateway sites; – Both sites can meet a need for a mix of uses as identified within our client's commercial report (submitted separately in the coming weeks) and as evidenced within the draft Local Plan which notes on page 86 that: "Park Royal as a whole currently suffers from a lack of facilities for businesses and employees, with only one nursery, two gyms, four hotels and no conference facilities. This presents a problem when trying to attract businesses into Park Royal, with some other industrial estates having more facilities available for staff and businesses. Therefore, introducing these uses could help create a more sustainable neighbourhood, with services being closer to where people live and work. However, any town centre uses would need to be small-scale 'walk-to' facilities, to complement the surrounding town centre hierarchy."

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
118	175	Planning Consultant	Rory	McManus	Turley	Ashia Centur Limited	P4		<p>As summarised in our previous representations, our client's site needs to be excluded from the SIL boundary and identified as an employment led, mixed use development site suitable for:</p> <ul style="list-style-type: none"> - Small and larger scale retail uses (Class A1-A5) - Class C1 hotel (including ancillary health club and conference facilities) - Class D1 cultural / exhibition centre - Class D2 leisure uses including cinema - Sui generis uses including casino, theatre, nightclub and television centre - Class B1a Office - Class B1b Research and Development - Class B1c Light industrial <p>for the following reasons:</p> <ul style="list-style-type: none"> · The site benefits from an extant planning permission for a major mixed use development; · The site at present is cleared and does not contribute towards the provision of industrial uses within the Opportunity Area – this has been the case for the past 25 years; · It will not contribute to the SIL as our client's intention is to complete the development permitted under the extant permission or similar scheme; · The site's removal from the Park Royal SIL (Broad Location) does not compromise the integrity or delivery of the remaining SIL land; · The implemented mixed use planning permission will not prejudice the successful operation of neighbouring industrial uses within the Park Royal SIL; · The site is located at the extreme west of the Opportunity Area and Park Royal SIL and is not a key integrated site within the SIL. The site is bound to the west by the North Circular Road, Abbey Road to the north and canal to the south and as such forms an independent site that is not linked with the remaining SIL; · The site represents a key gateway site into the Opportunity Area from the west; · The consented development is of a high quality design having been designed by Chapman Taylor Architects. The planning permission incorporates the British Pavilion designed for the World Expo, Seville (1992) designed by Sir Norman Foster. · The redevelopment of this site will act as a catalyst for further regenerating development with the Opportunity Area; · The planning permission has the potential to deliver the following: <ul style="list-style-type: none"> o 2,800 new jobs; o 1 million visitors to the site (hotel); o generate a financial benefits to the Opportunity Area of £15,000,000 per annum; and o provide 900 to 1000 jobs during construction. <p>The high levels of employment generated by the extant consent could never be achieved (even in part) by a traditional industrial development, nor would it be possible to achieve the high quality landmark development demanded by this important gateway site.</p>
90	236	Local Resident	John	Cox			P4		<p>This policy is unsound, based on what I have quoted under SP2 above. It is not positively prepared, because it fails to respond to LB of Brent policy to intensify and urbanise the areas around borough stations, including the land now under the control of the OPDC. I have been mentioning this in Brent for thirty years, and in LB of Ealing for a decade before that. LB of Brent officers will/should surely have mentioned the subject, which has been covered in the local press over the years (when we had a local press).</p> <p>Even without reference to LB of Brent, there is absolutely no point in you having Harlesden and Stonebridge Park stations within the OPDC boundary if you choose to completely ignore them. You should be stating your aspirations to transform the barren and hostile streetscapes around the stations, yet there is not a peep out of you.</p> <p>OPDC officers say that bog-standard Policy P4 is good enough for the two stations, but it is not. Your strategic planning is unjustified, because it is not the most appropriate strategy when considered against reasonable alternatives based on proportionate evidence (which you should have documented, since it is obvious when you visit the stations), and it is ineffective, since the alternative is deliverable over the Local Plan period based on effective joint working on cross-boundary strategic priorities.</p> <p>I hope the Planning Inspector will decide to walk around those two station locations, and agree with me that they are currently terrible examples of a century of planning neglect, something you have decided to do absolutely nothing about (unlike your mostly welcome plans for the immediate vicinities of Willesden Junction and Park Royal stations).</p>
36	286	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		P4		<p>The Mayor welcomes the revisions to Policy P4 clarifying the status of Park Royal as a leading location for industrial businesses.</p>
115	301	Local Resident	Nye	Jones			P4		<p>Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
210	311	Local Resident	Gail	Dobinson			P4		<p>TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
213	329	Local Resident	Rachel	Ritfeld			P4		<p>TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
213	342	Local Resident	Rachel	Ritfeld			P4		<p>Policy P4 on heritage and character does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
214	353	Local Resident	Ciara	Solmi			P4		<p>TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
32	391	Local Resident	Bernie	Timmins			P4		<p>I believe that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
219	450	Local Resident	Jane	Dreaper			P4		<p>TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
220	459	Local Resident	M.	Szoke			P4		<p>TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
221	468	Local Resident	James	Trew			P4		TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
221	481	Local Resident	James	Trew			P4		Policy P4 on heritage and character does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
19.b	492	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P4		Within Old Oak existing open space will be significantly enlarged, including a local park on the northern side of the canal connected via pedestrian bridges to the existing Birchwood Nature Reserve. We understand open space will also be created along the northern side of the canal where the installation of a new sewer running parallel to the canal will require a 12 m. wide easement. However, the situation in Park Royal gives rise to concern. The supporting study entitled 'Park Royal Development Framework Principles' indicates delivery of more attractive, greener and better-integrated public realm is needed to "address the current deficit". In spite of this, there is no significant new provision of open space. Indeed, throughout the Local Plan the future development of Park Royal is characterised as being one of industrial intensification.
19.b	493	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		P4		At present the canal corridor in Park Royal is relatively degraded, often hemmed in by blank industrial facades and minimal width of towpath and green verges. With this in mind, it is unfortunate the only improvements to this open space indicated in the Park Royal Development Framework Principles are "improved connections to the canal". Figure 6.3: Sites of Importance for Nature Conservation identifies the canal corridor as the only site of Metropolitan Importance within the OPDC area. Surely, for all of the above reasons, the space offered by the existing waterway should be enlarged and enhanced to form the green-blue backbone of the development.
223	554	Local Resident	Eileen	Hannington			P4		TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
223	567	Local Resident	Eileen	Hannington			P4		Policy P4 on heritage and character does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
225	638	Local Resident	Marta	Donaghey			P4		I believe that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
227	688	Local Resident	Jamie	Sutcliffe			P4		TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
28	734	Strategic Partner	Lucinda	Turner	Transport for London		P4	Policy part d	TfL welcomes the amendment which recognises the need for contributions towards and/or delivery of enhanced bus infrastructure to support existing and planned bus services. It may also be necessary to provide direct financial support to new or improved bus services that provide additional capacity or new connectivity. This should be made clear in the policy and supporting text.
28	735	Strategic Partner	Lucinda	Turner	Transport for London		P4C1	Policy part e (ii) B 3	TfL welcomes amended wording that clarifies the need for improvements to the walking and cycling links to Park Royal and Hanger Lane stations.
107	886	Residents Association	Mark	Walker	TITRA		P4		TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
107	902	Residents Association	Mark	Walker	TITRA		P4		Policy P4 on heritage and character does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it, which is disappointing.
228	915	Local Resident	Pablo	Navarrete			P4		TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
114	926	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		P4		2.9. We believe that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it, which is disappointing.
95	996	Local Resident	Mark	Walker			P4		I also think Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
101	1105	Local Resident	Jason	Salkely			P4		I believe that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.
234	1304	Local Resident	Elaine	Gristock			P4		Policy P4 on heritage and character is inadequate; again, an existing community (Wesley Estate) is not protected from the planned increase of SIL development around it.
235	1309	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	P4		Comment: "Park Royal West will continue to be London's leading location for large, medium and small industrial businesses." This is welcomed and fully supported. Changes sought: None, but this intent should be reflected more explicitly within the subsequent policy requirements.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
235	1310	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	P4		<p>Comment: This refers to the delivery of 3,540 new jobs (reduced from 3,800) within SIL, by taking opportunities to intensify the use of all sites, but in particular on identified site allocations and having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study.</p> <p>Whilst intensifying uses on all sites is welcomed, and accords with the growth agenda of the framework, these revisions again represent a reduction from the previous jobs target, which has the effect of diluting the overarching vision for Park Royal West. Park Royal West is 320ha in size, 250ha of which is designated as SIL. It is not clear why Park Royal West's contribution to the strategic jobs target is so low at 8.7%, particularly given the key aim of the plan to 'intensify, strengthen and protect' employment land.</p> <p>This observation is all the more relevant as this area experiences low vacancy rates and rising rent levels resulting from increased demand for industrial space across London. This demand will likely continue to come from a broad range of industrial sectors, but more transport intensive uses, such as transport and logistics operations and distribution centres have been increasingly attracted to Park Royal West. This is likely to continue over the Plan period with the arrival of Crossrail and HS2 and should be recognised and anticipated by the new planning framework for the area.</p> <p>Changes sought: Removal of any policy reference to a jobs target within Park Royal West, or the Park Royal SIL. The Policy already states that growth will be delivered through the intensification of "the use of all sites". It therefore does not need to be reliant upon the Intensification Study prepared by Hawkins Brown. SIL should be allowed to come forward unfettered in accordance with market conditions, without being overburdened by unnecessary jobs targets.</p> <p>As an example, part b) of this same policy refers to a target of delivering 60 jobs on sites outside of SIL. This is unnecessary and should be removed.</p>
235	1311	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	P4		<p>Comment: This is a new policy requirement that states that proposals should support increased building heights where this will deliver industrial intensification and SIL compliant broad industrial type activities.</p> <p>This is welcomed and fully supported as it will allow other policy requirements, such as providing a range of unit sizes, to be accorded with i.e. through the stacking of units.</p> <p>Changes sought: No changes sought.</p>
43	1324	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	P4		<p>The vision for Park Royal West is identified as follows: "Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably"</p> <p>In principle, we continue to be supportive of the aspirations for Park Royal to remain as London's leading location for large, medium and small businesses. Whilst we agree that the area should continue to provide and protect a mixture of industrial uses, we do not agree that intensification must be confined to simply industrial uses on sites in close proximity to public transport in Park Royal. If there is a net gain in industrial floorspace, why can't these SIL uses be accompanied by other compatible uses, such as hotel which, has the potential to offer complementary services to both the SIL sector as well as servicing to a degree the nearby town centre? Providing other complementary non-SIL in addition to SIL uses will 'optimise development' as outlined in policy SP9.</p>
43	1325	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	P4		<p>We welcome the addition to the text of P4, part a 'land uses' where it states that proposals should "contribute towards delivering 3,540 new jobs within SIL, by taking opportunities to intensify the use of all sites, but in particular on the identified industrial site allocations and having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study ..." In our view, all sites should be required to demonstrate that they have considered the opportunity to intensify their use of land, not just those allocated in the Intensification Study.</p>
103	1342	Local Resident	David	Turner			P4		<p>TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
89	1352	Local Resident	Nicky	Guymer			P4		<p>TITRA believes that Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.</p>
110.b	1461	Community Group	Robin	Brown	Grand Union Alliance		P4		<p>P4 Vision: As part of a more concerted regeneration effort for Park Royal, plan for a permanent facility within Park Royal for skills and training College(s) of Further Education. This would assist in 'gearing up' the workforce for new and emerging technologies as well as for construction employment in and around Old Oak, and help achieve the Vision – stronger competitive position and business growth. So far only a temporary planning permission has been granted (recently) for West London College to site in Park Royal.</p>
110.b	1462	Community Group	Robin	Brown	Grand Union Alliance		P4		<p>P4 Vision, P4 a), P4 c) i, P5 a): Industrial intensification, along with Park Royal Town Centre development, will necessarily result in highway alterations and on street parking management controls to regulate the inevitable increased competition for road space and the provision of better walking and cycling facilities. The extinguishment of car parking and/or increased demand for parking not only for drive to work but also driving as part of work – deliveries, sales etc. – essential to the functioning of Park Royal may well increase displacement to the Wesley Estate.</p>
110.b	1463	Community Group	Robin	Brown	Grand Union Alliance		P4		<p>Parking and traffic management measures that underpin the OPDC's approach to regenerating Park Royal. It is the local boroughs that have the mechanisms to draw down resources and implement through their Highway Authority role and the Local Implementation Plans. Therefore, the OPDC's proposed interventions have not the required level of certainty as to delivery. The borough may also be swayed by their electorate and business rate payer resisting more restrictive measures.</p>
110.b	1464	Community Group	Robin	Brown	Grand Union Alliance		P4		<p>There are also issues around funding various improvements advanced in P4 and P5. Although much store is placed on wider benefits accruing from development, the OPDC is pursuing a practice of CIL 'light', S106 'heavy'. S106 monies are required to mitigate specific impacts of developments, the benefits are tightly restricted. Therefore, it is questionable if the improvement ambitions can then be met through a reliance on development materialising as and when.</p>
110.b	1465	Community Group	Robin	Brown	Grand Union Alliance		P4		<p>P4 c), P4 d), P4 j): Pavements particularly are of poor quality and need to be designed with accessibility and inclusion in mind (in respect of disabled and older people and those with young children and buggies in mind).</p>
110.b	1466	Community Group	Robin	Brown	Grand Union Alliance		P4		<p>P4 c) ii, P4 f) i: As part of the new walking and cycling improvements, their corridors should be subject to enhancement and development proposals; for example, the approach to Park Royal from Harlesden along Acton Lane, where a significant development opportunity is the Acton Lane frontage to McVities factory. Partly in order for key routes to benefit from being situated within more coordination and planning and to maximise their utility and purpose, clusters should be designated around Harlesden and Stonebridge Stations, as has been done for P4C1 Brewery Cluster.</p>

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110.b	1467	Community Group	Robin	Brown	Grand Union Alliance		P4		P4 d): Wesley Estate is isolated and distant from community supporting facilities. This needs to be remedied as does the lack of more direct bus route to North Acton Station and beyond.
110.b	1563	Community Group	Robin	Brown	Grand Union Alliance		P4		The community members fully recognize the unique significance and importance of Park Royal industrial estate. It has been, and is, a leader in a wide range of industrial innovation, including engineering, fashion, construction, food, and health products. Everything should be done to support its further development, but at the same time recognize that now is a real opportunity for change. There is considerable undeveloped land, and also land given over to parking. A sizable number of workers travel by car to work, as connection to the underground stations is less than adequate. This needs to change, with seriously improved transit, so land can be freed up for other uses. New enterprises can be established, and existing expanded with incentives to develop underused areas. At the same time, significant existing buildings should be protected and sensitively expanded. This may require special planning powers to create an "enterprise zone". Here, new industrial incubators can start up, existing businesses expand, affordable housing and amenities can be integrated into the area, and all creating a healthy environment, encouraging walking and accessible through reliable local transit. Also, this "enterprise zone" could have "clusters" at interesting intersections, acting as small town centres and gathering points of differing character. These could be in the form of a linear high street, or a new centre adjacent to the hospital, each bringing identity and purpose that in turn will render it a more attractive job environment.

P5 Old Park Royal

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
205	28	Local Resident	Theresa	Magee	Wesley Estate Residents Association		P5		My biggest worry for the area would be the traffic. Again the general idea is to encourage people to walk or cycle, but the reality is we will never get everyone out of their cars.
205	29	Local Resident	Theresa	Magee	Wesley Estate Residents Association		P5		At the moment , the residents of the Wesley Estate have so many problems with local garages using us a an overflow car park. In spite of reporting this to the council several time , no one has come up with a suggestion , that would solve the problem. Residents pay for CPZ but outside the controlled hours businesses all around take advantage of our streets. At weekends car showrooms expand their businesses all along North Acton Road.
205	30	Local Resident	Theresa	Magee	Wesley Estate Residents Association		P5		Please take these problem into consideration when making your decisions, also when giving permission for new companies who want to open in this area,Please take into account the residents HOMES who may be effected by their windows overlooking their gardens noise, smells and disruption .
113	421	Local Resident	Thomas	Dyton	WHRRRA (Member)		P5		Affordable community commercial space, e.g. artist studios and workshops, should be included in the mix within Park Royal. We also require community spaces and facilities – including meanwhile spaces and play areas for children.
93	539	Residents Association			Wells House Road Residents Association		P5		Affordable community commercial space, e.g. artist studios and workshops, should be included in the mix within Park Royal. We also require community spaces and facilities – including meanwhile spaces and play areas for children.
236	1357	Neighbourhood Forum	Janice	Gayle-Farlow	Central Acton Neighbourhood Forum		P5		Park Royal would benefit in having more areas of mixed use. Using the local stock Park Royal could realise some local style housing above existing Alnet warehouses, live work creative spaces plus affordable studios. Look to Hackney Wick and Shoreditch for examples.
110.b	1474	Community Group	Robin	Brown	Grand Union Alliance		P5	OPR4	(This is to be read in conjunction with the critique on P4 a) and P5 a) and OPDC's Park Royal Intensification Study). We are concerned about Old Park royal where the Local Plan notes the predominance of small and affordable business units. Here the requirement for all sites to seek intensification to compensate for Old Oak de-designation will be onerous. This is acknowledged in the following supporting text: "P5 para OPR4. Evidence demonstrates that Old Park Royal accommodates a high proportion and density of smaller business units relative to that of Park Royal West2. This includes a variety of sectors and many highly valued independent businesses. It is the combination of the built environment, business type, size and employment densities which give rise to the lively urban industrial environment in Old Park Royal. OPDC will seek to protect this concentration of smaller business units within the Old Park Royal by prioritising the provision or re-provision of small business units when applying the policy requirements of Policies E1 and E3." However the onerous viability constraints of industrial land development evidenced in the 2017 and 2018 PR Intensification Studies mean that this re-provision, through planning obligations, will be difficult if not impossible to achieve.

P6 Park Royal Centre

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
202	5	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		We represent the owner of 247 Acton Lane which is located in the OPDC Park Royal character area. We agree with the new OPDC Draft Local Plan which removes the Park Royal Neighbourhood town centre from its previous Strategic Industrial Location designation.
202	6	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		On that basis we contend that 247 Acton Lane should be regarded as an official Local Plan site allocation rather than as a Local Plan windfall site. This is primarily, although not exclusively, due to the lack of certainty around the delivery of the stipulated minimum of 650 residential units in years 0-10 within the Park Royal character area

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
202	7	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		The majority of this 650 unit residential target is largely contingent on the nearby Asda site delivering 500 units . On that basis we question the level of certainty the Plan attributes to this site within the time frame envisaged, particularly since the Draft Plan states that in order to optimise its potential a considered and comprehensive approach is required? This is undoubtedly a time consuming exercise and is one, regarding optimising densities, advocated by the 2018 Draft NPPF in its Achieving Appropriate Densities section (para 123).
202	8	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		Conversely, as a smaller site with a willing land owner there is a greater degree of certainty that 247 Acton Lane would be delivered within the 10 year timeframe.
202	9	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		It should also be recognised that the housing target in the Park Royal area is solely made up of two site allocations leaving very little flexibility in terms of deliverability if obstacles arise within the specified timeframe.
202	10	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		Furthermore, the Draft Plan states that the 650 unit target for the Park Royal area is a minimum. On this basis it is advocated that 247 Acton Lane should be seen as contributing to the aim to deliver at least 1,100 homes in the area.
202	11	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		Creating a successful place is central to the vision for Park Royal. The subject site and the surrounding buildings will be intrinsic in the creation of a cohesive and legible town centre and the establishment of a more friendly public realm which at present is car dominated.
202	12	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		Allocation of this site as a primarily residential building with ancillary retail would be in keeping with the principles of meeting housing need along with creating a thriving Neighbourhood Centre and an active frontage in this area.
202	13	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		The Local Plan states that, proposals should contribute to a variety of building heights including a single tall building at the north-eastern corner of the ASDA site, to support local legibility and where this facilitates the delivery of the realigned road junction. It is therefore considered that in order to meet these objectives and generate the investment needed to improve the public realm and insure design quality through development value, permitted building heights in the town centre core (including the subject site) should be of a higher density.
202	14	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		In this instance the 15 + storey building proposed at the Asda site should contextualise the height of any building at 247 Acton Lane. An 8-10+ storey building on the subject site and in the localised collection of buildings focused around the Acton Lane Big X would be appropriate for a tall building cluster and would contribute to the creation of a legible neighbourhood centre of variable heights. The prevailing heights in this immediate area would contrast with the prevailing heights in the surrounding areas which are generally 2-4storeys. The permitted height of this building should also be based on quality of design rather than an imposed maximum. It should be noted that planning permission was granted in 2018 at a nearby site (described as the vacant plot to the east of the Victoria Centre) for erection of a part 4, 5, 6 & 9 storey building whilst the Victoria Centre which is adjacent to 247 Acton Lane is 10 storeys.
202	15	Planning Consultant	Matt	Randall	Planning Insight	Owner of 247 Acton Lane	P6		Higher density buildings in this location should be promoted particularly since infrastructure provision is concentrated in the central area and there is scope for optimising provision in terms of health and well-being.
205	27	Local Resident	Theresa	Magee	Wesley Estate Residents Association		P6		There was a lot of talk about the Park Royal town centre, and several people asked the question "WHERE IS THAT? " Asda's and central Middlesex do not make a town centre, We need more interesting areas. Perhaps something like Covent garden, small interesting shops or stalls, street food instead of these small cultural type restaurants that are springing up all around the area. There is room for a few of them but they are not communal ,more cultural and we need to welcome all residents , workers and visitors regardless of race or creed to embrace the new Park Royal.
23	131	Local Authority	Muhammed	Butt	London Borough of Brent		P6		Brent Council has been working with OPDC, the Clinical Commissioning Group and the Trust which runs the Central Middlesex Hospital to develop a joint masterplan for the development of Park Royal Centre, which will inform a future Supplementary Planning Document. A cluster of specialist older person housing is located on Acton Lane in the Park Royal Centre place, which benefits from synergies with health care at Central Middlesex Hospital. Emerging masterplanning work supports the Council's view that Park Royal Centre has further potential to provide additional specialist older persons housing. Policy P6 should therefore include the flexibility to enable a mix of housing to come forward in line with emerging masterplanning work. Change sought For the Plan to be sound Brent Council is seeking policy P6: Park Royal Centre to be amended as follows: (Deleted text struck through, new text underlined) "a) Supporting the delivery of a thriving mixed use neighbourhood centre by contributing to the delivery of 1,400 new jobs and a minimum of 650 new homes, <u>including specialist housing</u> , to support OPDC's 0-10 year housing supply;"
226	664	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		This representation highlights the unjustified proposed amendment to the boundary of the Park Royal Strategic Industrial Location (SIL) which has been extended to the west of the Neighbourhood Centre to include a parcel of land on Western Road which is owned by RBKC. The change to the SIL designation appears to be a cartographic anomaly, which may be unintentional, however as it stands this aspect of the Draft Local Plan is not justified, nor effective and as such is unsound for the reasons set out below.
226	665	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		RBKC are the legal owner of a site on Western Road, Park Royal that falls within the OPDC area (please see a site plan attached in Appendix 1). The site is situated to the west of the ASDA superstore and south of the Central Middlesex Hospital in Park Royal. RBKC acquired the site following the previous regulation 19 consultation and thus, the consultation for the second regulation 19 draft represents the first opportunity for RBKC to raise the matters set out in these representations.
226	666	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		RBKC have previously had pre-application discussions with the Ealing London Borough Council ¹ , and are currently in the process of preparing a full planning application for the redevelopment of the site. It is understood that the site previously formed part of the wider ASDA landholding but has been disused for large periods, and currently has a temporary interim use. The site has never been used for a B class use. The existing site is currently used for open-air storage relating to a construction company, and is classed as a Sui-Generis use ² . The site also has an extant planning permission for a paper recycling use (B2 use class) granted in 2016 ³ . This permission has not been implemented and there is no prospect of this use coming forward.

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226	667	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>RBKC are proposing to re-site their existing car pound from Lot's Road (located in RBKC) to Western Road. The existing RBKC car pound on Lot's Road is presently within a residential area making the existing site unsustainable as a car pound.</p> <p>The car pound will provide a depot for the temporary storage of cars removed from the streets when illegally parked. The site will provide employment for circa 22 people. The use provides a significant level of employment and has many of the characteristics of an employment/industrial-type use but is technically classified as a Sui-Generis use.</p> <p>Under the existing Neighbourhood Centre designation, the site represents an appropriate transitional use that will provide jobs and represent an active use. This is in line with objective 4 of the 'Heart of Park Royal' of the Old Oak & Park Royal Opportunity Area Planning Framework (OAPF) (Chapter 6, page 104, OPDC, London Plan, adopted November 2015) which suggests that a mix of uses may be an acceptable way of providing a transition from the SIL uses.</p>
226	668	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		The Ealing London Borough Council pre-application response considered that the proposed use would be consistent with the aims and objectives of the Park Royal SIL and would not be of detriment to the aspirations of the Neighbourhood Town Centre designation.
226	669	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		Both the Old Oak & Park Royal OAPF (paragraph 6.19, London Plan, November 2015) and the London Plan (Policy 2.17 'Strategic Industrial Locations', 2016) state that development should ensure that it does not inhibit the function of the surrounding SIL, which is necessary to ensure its long term protection and enhancement. The proposed use would not inhibit the SIL as it is a suitable transitional use and would actually fulfil the core objective of job creation.
226	670	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>Through pre-application discussions it was asserted by Ealing London Borough Council that the site is located within the defined Strategic Industrial Location (SIL) and they were concerned that the proposed car pound use (a Sui-Generis use) would represent a loss of capacity within the designated SIL.</p> <p>The previous planning application approved on the site for a paper recycling use (ref: PP/2015/3534) was also assessed on the basis that the site is in the SIL designation (as referenced in the Officer's report).</p> <p>However, upon further investigation, it is clear that the site has been incorrectly identified as lying within the SIL area, and actually falls within the designated Neighbourhood Centre in the Heart of Park Royal. This is clearly set out in the following adopted documents. Extracts of the various maps/diagrams from these documents are attached in Appendix 2.</p> <ul style="list-style-type: none"> • Adopted Proposals Map (both the Interactive Online Map and Map Booklet) for the Ealing London Borough Council (December 2013); • The Old Oak and Park Royal Opportunity Area Planning Framework (OPDC, London Plan, November 2015); • Development Strategy 2026 (Ealing London Borough Council DPD, adopted 3rd April 2012). <p>As set out below, this misrepresentation of the site being currently zoned within the SIL designation has been carried through to the draft OPDC Local Plan. In the OPDC Draft Local Plan Regulation 18, the site was for the first time identified as part of a SIL area to be 'retained and enhanced' (figure 88 of the Regulation 18 OPDC Local Plan, 2016). However, as established above, the site is currently designated as part of the Neighbourhood Centre. The site was also not mentioned in Policy E3, Park Royal (preferred policy option, OPDC Regulation 18, 2016) as a proposed site to be designated as a new SIL site⁴. The site was therefore added to the SIL designation in Regulation 18 of the OPDC without any justification or explanation.</p> <p>The misrepresentation of the site designation has been carried through to the first and second regulation 19 draft OPDC local plan documents. The draft Proposals Map shows the boundary of the SIL designation amended to include the Western Road site. At no stage during the OPDC Draft Local Plan Consultation has any assessment, reasoning or justification been provided for the inclusion of this site within the SIL, or its specific removal from the existing Neighbourhood Centre designation.</p> <p>The addition of the site to the SIL designation as part of the emerging OPDC Local Plan would be inconsistent with the current adopted policy (Ealing London Borough Council). The proposed inclusion of the site has not been subject to any assessment as would be expected and as per the specific assessment work undertaken on other sites that are proposed for future inclusion within the SIL's. We also enclose a Market Assessment Report by Knight Frank (see Appendix 3). This letter sets out an assessment of the existing site and the proposed use. The site has never had a productive B Use class and a sui-generis use is proposed, as such it would not be a productive use of the site to designate it as SIL. The addition of the site to the SIL would add a potential policy barrier to the landowners proposed use of the site and could hinder the opportunity for a productive future use of the site.</p> <p>In summary, the Western Road site has been erroneously identified on the regulation 19 draft OPDC Local Plan proposals map as part of the Park Royal SIL, without any reference to the reasoning and justification to the change in any of the draft iterations of the OPDC Local Plan.</p> <p>Designating the site as SIL would not be an effective change and could prejudice a planned use coming forward which will provide a significant number of jobs and which has been identified in pre-application discussions as an appropriate transitional use in a Neighbourhood Centre. As such the draft second Regulation 19 OPDC Local Plan in this regard is unsound, and has not been prepared in accordance with the legal and procedural requirements, set out at paragraph 35 of the NPPF (July 2018).</p>
226	671	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>The proposals map for the emerging OPDC Local Plan should be corrected in line with the existing adopted Ealing Proposals Map to show the Western Road site remaining as part of the Heart of Park Royal Neighbourhood Centre.</p> <p>We trust that these representations will be given appropriate consideration in the preparation of the Proposed Submission Draft Plan. Should you wish to discuss these representations further then please do not hesitate to contact us.</p>
226	672	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>Knight Frank LLP has been instructed by the Royal Borough of Kensington and Chelsea ('RBKC') to provide a Market Assessment Report to support a planning application, for the development of a proposed new car pound at Western Road site. The RBKC is seeking to relocate its existing car pound from Lots Road, Chelsea to Western Road, Park Royal. The car pound provides a storage depot for the temporary storage of cars, which have been towed from the streets for being illegally parked. The depot will provide storage for approximately 40 vehicles and will accommodate approximately 10 deliveries, via car transporter, a day.</p> <p>The proposed use of the site as a vehicle car pound will technically be classified as sui-generis use. However, we consider that the proposed use has many characteristics of an employment use and will lead to an increase in job creation on the site. The proposed use is considered to represent an appropriate transitional use on the edge of the designated strategic industrial location.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
226	673	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>Whilst there is clearly a significant amount of demand for space in Park Royal and the wider area, particularly for industrial development, due to the physical constraints of the property this makes this site unsuitable for any industrial development of any size and scale. Small modern industrial/warehouse buildings would ideally be built to a minimum height of 7m internal height, which would make the external roof height in excess of 8m. Thereby due to the close proximity of the adjoining property would be unsuitable for such a development. The site is also very narrow which would make loading/unloading off Western Road prohibitive.</p> <p>Given the nature and limitations of the site, we are of the opinion that it would have a limited appeal to the occupier market and we view such suitable uses as:</p> <ul style="list-style-type: none"> - Car breakers yard - Open storage - Aggregate storage - Scaffolders yard - Container storage - Car wash - Builders yard/depot - MOT/car repair/body shop <p>The above uses, in our opinion, would not generate high levels of employment and would require no more than a handful of employees on site.</p> <p>The site in its current configuration does not provide for any built floor space apart from a small temporary office building and what is proposed intends to provide 545 sq. m of permanent office/amenity space creating an operation, which will support a number of full-time and permanent jobs.</p>
226	674	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>Park Royal remains a highly important, strategic industrial, production and warehousing location due to its proximity to Central London, communications and transport links allowing ease of access to the national motorway network. It is one of the few areas that can accommodate uses, including industrial type activities, operating 24 hours a day and creating noise, which can lead to land use conflicts elsewhere and therefore is deemed an appropriate area for the proposed use as a car pound.</p>
226	675	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>We have carried out a search for suitable alternative open storage sites in Park Royal and west London, which could potentially accommodate the car pound use (see attached flyer) and have identified the following:</p> <ul style="list-style-type: none"> - 163-165 Brent Road, Southall – 1.19 acres secure open storage site laid to hard standing, 24 hour access, available only for 3 years term certain with rolling breaks thereafter at a quoting rent of £4.50 psf. - Former Vale Site, Bashley Road, Park Royal – Vale announced the closure of their site in late 2017, the total area extends to 9.5 acres although it is yet to be determined whether they will dispose of all or part only and they are yet to instruct agents and commence marketing. - 17-21 Everitt Road, Kingham Industrial Estate, Park Royal – series of older style dilapidated buildings on a site of 0.628 acres. Only available on a short-term lease outside the act at a rent of £180,000 p.a. until 2020 after which redevelopment might follow. - London United Site, Kingston Road, Tolworth – 1.5 acres bus depot vehicle/coach workshop and open storage. Available by way of assignment for a lease outside the act expiring June 2022 at a rent of £275,000 per annum - Twickenham Trading Estate, Rugby Road, Twickenham – 0.5 acres open storage site available by way of assignment expiring September 2025 at a passing rent of £139,000 per annum. <p>None of the above properties offers the Royal Borough of Kensington and Chelsea with a viable alternative within close proximity to their Borough. The need for the car pound is a permanent one and it is not operationally viable or cost effective to invest in relocating and opening up a compound for it only to be relocated a short while after.</p>
226	676	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>The site is currently occupied by Mackin Limited, who utilise the yard areas for external storage of plant, machinery and tools. Mackin Limited are a London based contractor who are specialists in Groundwork, Civil Engineering and Highways work. The existing use is technically classified as a sui generis use. We were informed whilst on site that there were 8 people working on site that day and that at capacity there are no more than 15 employees in total working at the site.</p> <p>The proposed use in our view, represents an appropriate transitional use from the adjoining industrial uses to the neighbourhood centre focused around the ASDA superstore.</p>
226	677	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>The proposed use would bring some much-needed investment into the property, which would have a knock-on effect to the immediate surrounding area. The car pound would intensify the use of the site in a positive manor increasing the permanent floor space to the southern end of the site by 60 sq m (645 sq ft) providing good quality office space, meeting rooms and welfare facilities as well as fully lit secure yard which will all improve the quality of the site and the local environment.</p> <p>The proposed use does not result in a net loss of jobs and makes appropriate re-provision of industrial floor-space and provides and essential industrial use which cannot be accommodated elsewhere.</p>
226	678	Local Authority	James	Brown	Shrimplin Brown	Royal Borough of Kensington and Chelsea corporate property team	P6		<p>It is the author's opinion that a change of use to a sui-generis to be utilised as a car pound would be the best future alternative for the site because:</p> <ul style="list-style-type: none"> - There are no feasible alternative uses that will intensify the existing use of the site. - The immediate surrounding area will benefit through improving the environment of the site. - It is not thought that the site is suitable for industrial/warehouse redevelopment due to the physical constraints of the property. - It will provide a greater number of and higher quality jobs in keeping with the type of employment. - There are no viable alternative options for the RBKC to consider at this moment in time and any suitable opportunities would rarely manifest themselves in the near future.
110.b	1472	Community Group	Robin	Brown	Grand Union Alliance		P6		<p>We are concerned that the search for infrastructure costs to cover intensified development plans for Park Royal will lead to poor quality and overly dense and high developments coming forward in the Park Royal Centre area, Policy P6, in order to fund and support infrastructure developments and meet wider OPDC targets.(See our response on P6).</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
110.b	1475	Community Group	Robin	Brown	Grand Union Alliance		P6		Policy P6, PRC1: Town centre proposals for Park royal are overambitious, current demand here is very limited and future demand arising from development in vicinity would likely gravitate to larger more established centres. Depending on ASADs as a destination store only generates traffic congestion and would not ensure the attraction of other town centre uses. Nevertheless, improved public transport, particularly linking areas within and outside the OPDC area, together with proximity to other facilities in local centres within walking distances and more modest, sensitively sited housing are supported in principle.
110.b	1476	Community Group	Robin	Brown	Grand Union Alliance		P6		Policy P6, PRC5 (also PRC2 & 3): There is a need for key worker housing to support continued and expanding functioning of Central Middlesex Hospital and care homes, provision of which should be part of policy for housing development in Park Royal Town Centre.
110.b	1477	Community Group	Robin	Brown	Grand Union Alliance		P6		Policy 6, PRC5: the target of 650 minimum, up to 1100 homes is not supported by adequate public open space. Any new or enhanced publicly accessible open space would be designated 'Primary Shopping Centre' or 'Neighbourhood Town Centre (see Policies Map). Policy SP8 Green Infrastructure and Open Space fig. 3.13 identifies the Neighbourhood Town Centre to have locations of new smaller publicly accessible open space and Green Streets. There also needs to be proper provision for play space for existing and new communities and those spending time in the town centre. But this area will be intensively developed, crisscrossed by important vehicular routes and bus routes and needs to have vehicular servicing, including mobility impaired people accessing hospital and care home facilities. These would negate the defined role of Green streets as publically accessible open space inaccessible to vehicles, aside from limited access for servicing and deliveries (see Glossary). As well as concerns over open space and the quality of the public realm, there are concerns around the adequacy of community space and school place provision in the general area that will be exacerbated by more housing. Stonebridge Primary is to be redeveloped but this will not be enough. If there is to be housing on the ASDA site then it should provide for the achievement of lifetime neighbourhoods and should have a full range of supporting services and facilities within walking distance and not predominantly small units for those that do not establish connections and affections for an area.
110.b	1478	Community Group	Robin	Brown	Grand Union Alliance		P6		P6 h), P6 k), PRC6, PRC8, PRC10: the realignment and rearrangement of the road junctions into the 'Big X' may well create a more hostile environment for pedestrians and cyclists. In any event, there should be early consultation with the community on this and all public realm and movement proposals. The proposed study around the 'Big X' junction will happen only after the principle and plan have been progressed and, therefore, provide only retrospective justification. In addition to creating new and or improved continuous walking and cycling routes, these need to be supported by having secure, visually acceptable cycle banks / hubs / racks at appropriate sites within the town centre.
110.b	1479	Community Group	Robin	Brown	Grand Union Alliance		P6		Policy 6 m), n), PRC11: There are good assets here, including employment activities and buildings that should be retained and promoted. Fig.4.19 should be amended to include at least those buildings of merit that were included in the draft Local Heritage Listings document, the subject of public consultation earlier this year, along with part of the proposed Local Character Area (see Policies Map). An adverse impact on the local street scene and heritage assets, together with a lack of sensitivity to the predominant low rise character of the area would result from a tall building at the Asda site, particularly as a high building has already been granted planning approval across the road. Way finding should not justify tall buildings.

P7 North Acton and Acton Wells

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
27	22	Planning Consultant	Claire	Treanor	Treanor Consulting	Castlepride Limited	P7C2		These representations are submitted by Treanor Consulting on behalf of Castlepride Limited, owner of a 0.21 hectare site at the southern end of Midland Terrace, known as Midland Gate. The Site will be bisected to the north by the proposed pedestrian and cycle bridge to link Old Oak Common Lane Station westwards to Victoria Road, and the potential new platforms as part of the West London Orbital Line. The Site is integral to achieving the interchange connection promoted in the Local Plan. This is acknowledged in the draft Plan and through the place making designations. The proposed Old Oak High Street crosses the Site east-west. The Site is identified as part of the Station Cluster, with positive frontages stimulated by active town centre and employment uses and new residential development above. Redevelopment of the Site will help facilitate these Local Plan objectives. We submitted representations on the First Regulation 19 Consultation and welcome where changes to the draft Plan have been made in response. We now seek a further change as explained below.
27	23	Planning Consultant	Claire	Treanor	Treanor Consulting	Castlepride Limited	P7C2		The Site should be identified in Fig 3.15 as having potential for a tall building. Para OOL.13 recognises Midland Gate offers an opportunity for greater height being close to public transport access and as a way of helping to mitigate the impacts of railway infrastructure. For clarity this should also be reflected in the diagram (Fig 3.15). The Site will sit on a transport interchange. Redevelopment of the Site can help provide the much needed linkages and public realm that are fundamental in delivering the Local Plan Vision. A tall building on the site can act as a marker, assisting legibility and a focus for new routes, which will be important in an area undergoing such significant change.
27	24	Planning Consultant	Claire	Treanor	Treanor Consulting	Castlepride Limited	P7C2		Redevelopment of the Site is expected to help deliver important infrastructure requiring careful coordination and collaboration with TfL, Network Rail and other parties. It also needs to respond sensitively to its neighbourhood and surrounding context. These important considerations can be addressed with a well thought through comprehensive proposal. However, they impose pressures on development viability and the ability to deliver other planning obligations. The Draft Plan acknowledges the requirements for transport infrastructure will need to be balanced against other benefits to be expected from new development; Midland Gate is a case in point. A tall building at Midland Gate will be required to optimise the Site's potential and achieve the place-making aspirations of the draft Plan and enable phased development including early delivery of new housing and employment opportunities.
27	25	Planning Consultant	Claire	Treanor	Treanor Consulting	Castlepride Limited	P7C2		These representations should be read in conjunction with comments we made on the First Consultation, which still stand. We wish to reserve our position to expand upon these representations at further stages in the Local Plan process.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
206	31	Community Group	Jo	Winters	Ealing Civic Society		P7C1		Since most of the area covered by the OPDC is outside the London Borough Ealing, Ealing Civic Society is only commenting upon heritage elements which fall within our borough boundary. We support the proposal to locally list the Castle Pub in North Acton, partly because it is an unusual 1930s Tudorbethan design but also because it is one of the few community facilities in this rapidly developing residential area. We consider that this building should be designated a locally listed community asset as a matter of urgency as we are aware of development proposals in train that would result in its demolition.
23	132	Local Authority	Muhammed	Butt	London Borough of Brent		P7		We welcome amendments to the Plan to safeguard land for the West London Orbital Line Station. This is a key priority for the Mayor's Transport Strategy and for the boroughs forming the West London Alliance. The West London Orbital will create a connection between HS2 and Crossrail / Elizabeth Line to the west and Brent Cross Thameslink Station in the east. At a local level this will greatly improve orbital links which are currently reliant on the bus network and unreliable due to road congestion. It is an important part of the Council's strategy to improve public transport accessibility levels and reduce private vehicle use in line with the London Mayor's aspiration that by 2041 80% of all journeys are taken by walking, cycling or public transport. At a London wide level the development will create a strategic link between HS2, Crossrail and Thameslink and open up connectivity across West London.
23	133	Local Authority	Muhammed	Butt	London Borough of Brent		P7		Supporting text continues to refer to opportunities to better connect Wembley to Old Oak via a spur to the West Coast Main Line (WCML), however, it is noted policy to safeguard land for the WCML Crossrail spur has been removed from policy P7. The importance of the spur is outlined in our previous response and the Council seeks the reinstatement of policy wording to continue to safeguard land for this purpose or clarification regarding what other infrastructure scheme (such as Wycombe Single) has been committed which would utilise this spur. If no scheme has been committed Brent Council considers opportunity still exists for the WCML link to improve connections between the two opportunity areas. Change Sought For the Plan to be sound Brent Council is seeking policy P7: North Acton and Acton Wells to be amended as follows: (Deleted text struck through, new text underlined) "Infrastructure Safeguarding land for the delivery of the West London Orbital Line station and services within Acton Wells; and <u>West Coast Main Line Crossrail Spur; and</u> Providing on-site heating systems"
113	407	Local Resident	Thomas	Dyton	WHRRRA (Member)		P7C2		There remain concerns about possible 9 metre wide TFL 'cycle bridge' across Old Oak Common Land and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would cause massive impact to Kildun Court, Wells House Road and Midland Terrace residents in terms of both visual impact, noise and air pollution – as well as impacting on property prices. Residents of the quiet cul-de-sac of Midland Terrace would face up to 10,000 commuters per day walking past their front doors, making a noise and littering. (Please note that Ealing Council currently does little or no street cleaning in the area and there is no guarantee that this will change with the increase in foot traffic.) The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar but that this fulfils OPDC's ambition for a throughroad to North Acton with a total disregard to the local community.
93	525	Residents Association			Wells House Road Residents Association		P7C2		There remain concerns about possible 9 metre wide TFL 'cycle bridge' across Old Oak Common Land and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would cause massive impact to Kildun Court, Wells House Road and Midland Terrace residents in terms of both visual impact, noise and air pollution – as well as impacting on property prices. Residents of the quiet cul-de-sac of Midland Terrace would face up to 10,000 commuters per day walking past their front doors, making a noise and littering. (Please note that Ealing Council currently does little or no street cleaning in the area and there is no guarantee that this will change with the increase in foot traffic.) The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar but that this fulfils OPDC's ambition for a throughroad to North Acton with a total disregard to the local community.
98.b	616	Strategic Partner	Luke	Burroughs	Transport for London Commercial Development		P7		It is welcome that these policies identify the potential for the delivery of tall buildings across North Acton. However, the policy can further clarify that some of the TfL owned land surrounding North Acton Station is suitable for high quality residential led development including tall buildings.
25	658	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	P7		Figure 3.15 gives rise to potential contradiction with Policy P7. This states that building heights within Acton Wells East will generally be 10-12 storeys along Victoria Road. This should be clarified.
25	659	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	P7		We welcome the clarification that the Elizabeth Line Spur is no longer safeguarded and has been removed from Figure 4.21.
25	660	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	P7		We have no objection to the inclusion of a 'square' of public open space within the Osbourne Investments/Quattro landholding. This can be brought forward by masterplanning this area in due course. However, the removal of the Elizabeth Line Spur means that the size and location of the square is flexible and need not necessarily be as identified on Figure 4.21. We have no objection on this matter provided ODPC confirms that the size and location of Acton Wells Square is indicative.
25	662	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	P7		The Boden House site is in a highly sustainable and accessible location within the Old Oak Opportunity Area. The site is available for redevelopment for delivering a mix of uses on a key route within the area. Given the emerging development context and the strategic accessibility of the site, it is submitted that the highest density of development and tall building heights are appropriate and will enable the area to deliver the homes and jobs required.

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28	695	Strategic Partner	Lucinda	Turner	Transport for London		P7C1		Joint work is continuing to examine what capacity, passenger experience accessibility and connectivity upgrade measures are needed at North Acton and Willesden Junction Stations. Work is also ongoing considering service enhancement options for the North London and West London Lines line to accommodate the forecast passenger growth which may include new rail infrastructure and rolling stock. TfL is pleased to note that a summary of the latest findings from the North Acton Station Feasibility Study and the Willesden Junction Station Feasibility Study are included as part of the Local Plan Evidence Base. As previously requested, rather than referring to a station square as the preferred design solution for new or redeveloped stations, the wording should be more flexible to allow for alternative public realm solutions that may emerge from design and development work.
28	736	Strategic Partner	Lucinda	Turner	Transport for London		P7	Policy part M and NA 18	This states that development proposals should safeguard land for the potential delivery of the proposed London Overground West London Orbital line, which may include interchange with the potential Old Oak Common Lane Overground Station. This is consistent with Proposal 88 of the Mayor's Transport Strategy and is broadly welcomed. To better reflect the current status of the scheme, we suggest that text is added noting that "TfL is currently undertaking work with stakeholders to further develop the proposal, including reviewing the feasibility of the scheme and updating the business case."
28	737	Strategic Partner	Lucinda	Turner	Transport for London		P7C1	Policy F and NAT 5	The policies and supporting text for North Acton station are broadly consistent with TfL's aspirations for the interchange. Improving the accessibility, permeability and capacity of North Acton Station is key to ensuring that growth in North Acton can be delivered in a sustainable manner. TfL welcomes support for necessary improvements at the station including step free access and additional capacity to cater for increased development related trips as well as the delivery of associated pedestrian and cycle links between the station and development sites.
28	738	Strategic Partner	Lucinda	Turner	Transport for London		P7C2	Vision, Figure 4.25, Policy part c and d	Further work will be required to develop the final designs for the potential new London Overground station at Old Oak Common Lane. The draft Local Plan suggests some design solutions including a station square. However, the final station proposals and arrangements for the public realm remain under development and will be taken forward through close working between TfL, OPDC and other stakeholders. As new London Overground stations are not yet committed or funded, all text and figures should refer to a 'potential' new station at Old Oak Common Lane
28	739	Strategic Partner	Lucinda	Turner	Transport for London		P7C2	OCL1	TfL suggests this is reworded to state: The potential Old Oak Common Lane station would provide passengers with the opportunity to easily interchange between London Overground services on the North London Line and HS2, Elizabeth Line and GWML services at Old Oak Common Station as well as access the wider Old Oak area. It will also provide local residents and workers with access to London Overground services to a wide array of destinations across London. The station and surrounding public realm, including links to the Old Oak Common station will need to be designed to support this role.
28	740	Strategic Partner	Lucinda	Turner	Transport for London		P7C2	OCL3	The delivery of a Old Oak Street as a public route between Old Oak Common Station and Acton Wells is challenging and TfL supports the reference that further work is required on the design of this route
107	905	Residents Association	Mark	Walker	TITRA		P7C2		TITRA notes Policy P7C2: Public realm and movement commits to: "b) Working positively and proactively with TfL to ensure the feasible delivery of a high quality public route between Old Oak South and Acton Wells that: i) supports and seamlessly continues the public realm and walking and cycling routes of Old Oak High Street; ii) is integrated with Old Oak Common Lane Station; iii) integrates the station square including transport interchange facilities on the western side, with improvements to public realm and interchange facilities to the east; iv) integrates level changes and railway infrastructure within its design; v) provides sensitive walking and cycling access to Midland Terrace; vi) delivers active frontages; vii) integrates with surrounding development opportunities; and viii) conserves the residential amenity of Midland Terrace and Wells House Road. TITRA believes that Policy P7C2 is inadequate since TFL has already presented early-stage proposals for a high-level pedestrian bridge at the end of Midland Terrace (that connects to Old Oak Common Lane) that local communities have already objected to very strongly but these plans have not been referenced in this draft.
107	906	Residents Association	Mark	Walker	TITRA		P7	iv)	TITRA objects to Policy P7 iv) (page 99) which talk about "generally lower heights [of buildings] adjacent to sensitive locations including existing residential neighbourhoods at Wells House Road, Midland Terrace, along Jenner Avenue and along Long Drive..." TITRA finds this policy to be inadequate – there should be a stronger and more open commitment to conserve Wells House Road and Midland Terrace and state clearly the lower building heights intended in its Local Plan. Apart from the OPDC saying it believes that heights of eight storeys along the canal the only evidence we have is that the OPDC piloted through the 26-storey Oaklands development's approval. We think this policy P7 is unclear and unsound.
95	991	Local Resident	Mark	Walker			P7		I object to policy P7 with its vision of tall buildings in the Victoria Road area at the end of Midland Terrace (adjacent to TFL's planned bridge) as well as to the tall buildings suggested to the west of Midland Terrace on the Tunnel drive compound / 'Acton Wells East'. These buildings will badly harm Midland Terrace's amenity
56	1143	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P7C1		No detailed comments although it is noted that the reference to green infrastructure and environment issues is very brief in this policy compared to the others. Consider making this section a bit more comprehensive.
235	1312	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	P7		Comment: This policy refers to encouraging building heights within Acton Wells East at 10 to 12-storeys along Victoria Road. This is welcomed and fully supported, as this will encourage the OPDC's preference for clustering of town centre and residential uses around the proposed public transport interchanges. Changes sought: No changes sought.
235	1313	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	P7 and P7C2		Comment: Policy requirements and spatial designations that are relevant to both 'Places' (Policy P7) and 'Clusters' (Policy P7C2) should be replicated across the respective policies, rather than just applying to the Place Policy to avoid repetition. Cluster policies should seek to better define the approach taken at the Place Policy level and include the finer grain details. This approach would create a consistent, legible, drilled-down approach; and would avoid repetition and avoid unnecessary confusion and complexity. Changes sought: We recommend that all relevant Cluster policies retain all applicable policy requirements and designations controlled by the corresponding Place policy. As an example, Policy P7C2 makes no reference to building heights, even though Policy P7 encourages significant massing within this cluster location. In this respect, the policies should revert to their previous form and as originally drafted.

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235	1314	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	P7C2		Comment: Disagree with the less ambitious and amended wording, which now refers to "high quality public transport interchange" as opposed to the previous "important arrival point into Old Oak South and Acton Wells". This former description was more encouraging of gateway development than its replacement which is less clear and less likely to achieve its policy aims and consequence. Changes sought: Amend the Vision text as follows: "Old Oak Common Lane Station will form a key gateway development for Old Oak South and Acton Wells, comprising be a high quality public transport interchange that is fully integrated with Old Oak Street"
235	1315	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	P7C2	Figure 4.25	Comment: For a policy that is prescriptive, the indicative drawing illustrating the various designations and proposed features is difficult to read. For instance, it is unclear from the key whether 'Old Oak Street' is a new route (which it is). This Cluster policy should also incorporate the requirements of the Acton Wells East Site Allocation, which falls within the North Acton and Acton Wells Cluster. As drafted, the illustration lacks precision, and any policy based on it will be vague and imprecise. Changes sought: Incorporation of a more legible indicative drawing under Figure 4.25, which captures all applicable spatial designations, and creates certainty.
110.b	1480	Community Group	Robin	Brown	Grand Union Alliance		P7		Vision, f), m): Promises of high quality tall buildings with high quality and coordinated public realm are not being presently delivered. North Acton serves as a very poor template for Old Oak. Similarly the promised vibrant, active, satisfactorily maintained neighbourhood and town centre is not materialising. Dominated by student accommodation the area is characterised by churn and seasonal periods of activity/inactivity. Adding active frontages alone is insufficient to create North Acton as a place/destination. Clustering of (very) tall buildings may be visually dramatic, but it does have adverse consequences with overshadowing, wind funnelling etc. Need to retain original buildings to balance the high rise or glazed buildings. Creating town centres require careful curation to secure active attractive places. Need for animated place-making strategy and supporting document detailing design and management of the public realm. Over station and railway cutting development would disrupt this as a nature corridor. Designation of the cemetery s open space opposed as inappropriate.
237	1583	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		P7		There is an urgent need for OPDC to work with Ealing Council on North Acton - in particular to stop the building of towers for students and to preserve the Castle pub!
237	1591	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		P7		Another Major concern being ignored is that there is no equality impact assessment have been done at all which would take into account all surrounding high rise densely populated buildings in place already and those high rise buildings awaiting approval and those buildings already approved to start building!
237	1592	Residents Association	Sheela	Selvajothy	West Acton Residents Association (WARA)		P7		These blights are totally being ignored by Ealing Council and it's planners along with the Ealing Labour Councillors who have totally ignored the residents' asking to stop high rise densely populated buildings which are not beneficial at all!
29	1601	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7C1		On behalf of our joint clients, the Citrus Group ("Citrus") and Fuller Smith & Turner ("Fullers"), we enclose representations on the Old Oak and Park Royal Development Corporation (OPDC) second revised draft Local Plan consultation, published for consultation until 30 July 2018. These representations represent the third submission made by our clients following responses submitted to the Revised Draft Local Plan (September 2017) and Local Heritage Listings (March 2018). By way of background, Citrus1 own The Portal site within the OPDC area – Site Allocation 17 on Figure 4.2 – and Fullers own The Castle Public House ("The Castle") which abuts The Portal site to the north and is identified in emerging Policy P7. Over the past two years Citrus has been progressing a residential-led development on The Portal site and recently secured a resolution to grant planning permission following an Ealing Council Planning Committee meeting in May 2017 (ref: 165514OPDFUL). Citrus has also entered into an agreement with Fullers to explore the potential of The Castle site in the context of the Council's and OPDC's aspirations for the wider area, and pre-application discussions are currently underway with Ealing Council and the GLA. Overall, Citrus and Fullers support the emphasis within the revised draft Local Plan on delivering growth and new residential accommodation within the OPDC area but strongly object to the proposed local listing of The Castle. We provide specific comments below on the following policies below P7, P7C1, TCC7, D8 and H10.
29	1602	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7		The vision proposed for the North Acton area is strongly supported by our clients, particularly the recognition that North Acton and Acton Wells will be a high density mixed use area accommodating tall buildings.
29	1603	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7		Land Uses Citrus and Fullers support the range of land uses proposed for North Acton within Policy P7, especially the targets identified under (b) to support the delivery of mixed use high density residential and student accommodation, which are considered to be suitable uses given the existing and emerging developments in the area. Fullers also support the provision under (d) for the delivery of town centre uses within designated town centres.
29	1604	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7		Public realm and movement Our clients support proposals under (g) and (j) to deliver a coordinated high quality public realm supported by positive and active frontages. Citrus incorporated a detailed public realm offering, with active ground floor uses spilling out into this, as part of The Portal scheme and designed the scheme such that it connected well to the existing and emerging network of emerging public spaces in North Acton.
29	1605	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7		Building heights The principle of tall buildings in North Acton neighbourhood town centre and other key routes is supported as this is considered clearly to be reflective of the existing, approved and emerging scale of development in North Acton.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
29	1606	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7		Heritage and context Our clients strongly object to the proposed local listing of The Castle as referenced under (m) and shown on Figure 4.21 of Policy P7. The justification for this is provided as a single response to Policy D8 below.
29	1607	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7C1		As identified above, Citrus and Fullers are supportive of the principle of a vibrant high density neighbourhood town centre supported by a variety of town centre uses with residential above as outlined in Policy P7C1. However, both parties object to the retention of The Castle as a locally listed building as identified on Figure 4.23 and particularly the retention of the building, and use, in its current layout and form which represents an inefficient use of a prominent corner site given the policy direction for the area as a whole.
29	1608	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7C1		The Castle is an unremarkable pub typical of its era and of little intrinsic historic value. It does not sit comfortably with the rapidly evolving built environment and changing demographic in North Acton. We note the following in respect of this policy: 1 Beyond the previously locally listed Elizabeth Arden Factory, no other buildings in North Acton have previously been considered to be worthy of designation as a locally listed building by the Ealing Council; nothing has changed in the interim to suggest a different conclusion in respect of this building; 2 In the determination of the various recent applications for new developments in North Acton, no heritage assets (aside from the Elizabeth Arden Factory) were identified by the Council or constituted a material consideration; 3 The setting of North Acton has changed from what used to be a historic industrial area to one which is now dominated by tall residential/student accommodation blocks and modern light industrial units. Consequently, it is considered that The Castle is now completely out of scale and context with the developments around it and represents inefficient use of land within a designated Opportunity Area; and 4 That the area has changed and other buildings in the vicinity may have been lost over the years does not affect the historic significance (or lack thereof) of The Castle. What has happened elsewhere should have little or no bearing on an assessment of the merits of locally listing this specific building, which is unremarkable and where there are many other examples of buildings typical of this era.
29	1609	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7C1		Given that Policy P7 promotes the high density mixed-use development of tall buildings in North Acton (to provide a significant contribution to meeting housing needs), it is not considered that the change in the area from one of industry and rail and road networks should be cited as a reason for retaining buildings with little or no historic value, and where doing so could undermine the objectives of the planned and emerging environment.
29	1610	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		P7C1		The current building is somewhat dilapidated and requires significant investment. Externally it is a physically unremarkable building and now sits in an area which has undergone – and continues to undergo – rapid change. A large amount of The Castle's current trade came from Carphone Warehouse employees but their office has planning permission and is expected to be redeveloped for residential uses. The area is changing both physically and demographically. New developments planned in the area are incorporating a range of commercial uses at ground level including A3/A4 units (i.e. planned within the 'Perfume Factory' development which is located directly opposite the site). There will be no shortage of such uses in this newly forming neighbourhood and the quality of the commercial accommodation proposed will be designed to meet the needs of occupiers and satisfy the demands of the changing demographic client base in the area.

P8 Old Oak Lane and Old Oak Common Lane

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
90	243	Local Resident	John	Cox			P8		I oppose the de-SIL-ification of the land immediately to the south of the West Coast Main Line (WCML) tracks. Some of the current light-industrial units to the west of Old Oak Lane provide the future route for a A4000 bypass, running from the southern end of the WCML bridge, through new developments to the west of the Island Triangle estate, then via your already planned bridge over the Grand Union Canal, and then via Atlas Road back to Old Oak Lane's junction with Victoria Road and Old Oak Common Lane. The current A4000 route through the Island Triangle estate could then be de-designated, and used for local estate traffic only and maybe buses, improving air quality and other enormous current environmental harm to the estate.
115	299	Local Resident	Nye	Jones			P8		Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
210	309	Local Resident	Gail	Dobinson			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
212	319	Local Resident	Natasha	Salkey			P8		Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
213	327	Local Resident	Rachel	Ritfeld			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
213	343	Local Resident	Rachel	Ritfeld			P8		Policy P8 claims to protect the Old Oak Lane and Old Oak Common Lane communities' local heritage and character by: "i) conserving and enhancing the: Old Oak Lane Conservation Area, Grand Union Canal Conservation Area and their settings; proposed locally listed buildings of the Former Railway Institute, Fisherman's Arms Public House, Stoke Place Terrace and 1-17 Farley Buildings; and proposed Area of Local Character at Wells House Road. ii) ensuring future local character is informed by the area's existing heritage including the railways, Grand Union Canal, residential and industrial heritage" yet there is no mention at all of enhancing Midland Terrace and Shaftesbury Gardens or how these residential areas should be enhanced when the policy is calling for 2,600 new homes in this area and there is no discussion of a buffer around existing communities which we have previously called for. TITRA believes that Policy P8 is inadequate.
214	351	Local Resident	Ciara	Solmi			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
91	356	Local Resident	Bruce	Stevenson			P8		I believe it is crucial to see clear plans for the closure of Channel Gate Rd, partly because again huge Lorries and their noxious loads create a detriment to children and local residents health.
32	389	Local Resident	Bernie	Timmins			P8		I object Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
113	393	Local Resident	Thomas	Dyton	WHRRA (Member)		P8		1 About Wells House Road Residents Association (WHRAA) 1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 350+ Wells House Road residents, tenants and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul de sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
113	394	Local Resident	Thomas	Dyton	WHRRA (Member)		P8		2 WHRRA work in harmony with other local community groups 2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: § Grand Union Alliance § Old Oak Neighbourhood Forum § TITRA § Wesley Estate RA § Midland Terrace & Shaftesbury Gardens Residents § Hammersmith Society § Ealing Matters § West Acton Residents Association (WARA) § Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
113	399	Local Resident	Thomas	Dyton	WHRRA (Member)		P8		3.4 In order to 'soften the blow' of the high density development, there is a need for a 'buffer zone' of about 100 yards between existing communities and new developments that are higher than existing buildings. This should include green space and low-rise buildings. We require justification of the unreasonable plot ratios and the 'soft area' why this has not been included in Reg 19 despite our requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
113	405	Local Resident	Thomas	Dyton	WHRRA (Member)		P8		Residents are concerned about the construction noise, air & light pollution and disruption that adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will be effectively in the centre of a massive building site for 20-30 years. 3.13 We ask that the OPDC acts humanely and works with HS2 to extend ACOUSTIC GLAZING and AIR FILTERING SYSTEMS to ALL HOUSES IN Wells House Road, back & front.
113	414	Local Resident	Thomas	Dyton	WHRRA (Member)		P8		We also ask for 'sweeteners' for Wells House Road and other local residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our sustaining wall as a green wall which will help the entire community deal with noise and pollution. We would ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community and to provide meanwhile spaces for our children to escape the pollution of the decades of construction.
219	448	Local Resident	Jane	Dreaper			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
220	457	Local Resident	M.	Szoke			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
221	466	Local Resident	James	Trew			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.

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221	482	Local Resident	James	Trew			P8		Policy P8 claims to protect the Old Oak Lane and Old Oak Common Lane communities' local heritage and character by: "i) conserving and enhancing the: Old Oak Lane Conservation Area, Grand Union Canal Conservation Area and their settings; proposed locally listed buildings of the Former Railway Institute, Fisherman's Arms Public House, Stoke Place Terrace and 1-17 Farley Buildings; and proposed Area of Local Character at Wells House Road. ii) ensuring future local character is informed by the area's existing heritage including the railways, Grand Union Canal, residential and industrial heritage" yet there is no mention at all of enhancing Midland Terrace and Shaftesbury Gardens or how these residential areas should be enhanced when the policy is calling for 2,600 new homes in this area and there is no discussion of a buffer around existing communities which we have previously called for. TITRA believes that Policy P8 is inadequate.
93	510	Residents Association			Wells House Road Residents Association		P8		1 About Wells House Road Residents Association (WHRAA) 1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 350+ Wells House Road residents, tenants and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul de sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
93	511	Residents Association			Wells House Road Residents Association		P8		2 WHRRA work in harmony with other local community groups 2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: § Grand Union Alliance § Old Oak Neighbourhood Forum § TITRA § Wesley Estate RA § Midland Terrace & Shaftesbury Gardens Residents § Hammersmith Society § Ealing Matters § West Acton Residents Association (WARA) § Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
93	517	Residents Association			Wells House Road Residents Association		P8		In order to 'soften the blow' of the high density development, there is a need for a 'buffer zone' of at least 100 yards between existing communities and new developments that are higher than existing buildings. This buffer zone should include only green space and low-rise buildings, no higher than existing residential structures. At all costs, OPDC developments should avoid overshadowing existing properties and should revert to the previous agreement in Reg 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
93	523	Residents Association			Wells House Road Residents Association		P8		Residents are concerned about the construction noise, air & light pollution and disruption that adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will be effectively in the centre of a massive building site for 20-30 years. 3.13 We ask that the OPDC acts humanely and works with HS2 to extend ACOUSTIC GLAZING and AIR FILTERING SYSTEMS to ALL HOUSES IN Wells House Road, back & front.
93	532	Residents Association			Wells House Road Residents Association		P8		We also ask for 'sweeteners' for Wells House Road and other local residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our sustaining wall as a green wall which will help the entire community deal with noise and pollution. We would ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community and to provide meanwhile spaces for our children to escape the pollution of the decades of construction.
223	552	Local Resident	Eileen	Hannington			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
223	568	Local Resident	Eileen	Hannington			P8		Policy P8 claims to protect the Old Oak Lane and Old Oak Common Lane communities' local heritage and character by: "i) conserving and enhancing the: Old Oak Lane Conservation Area, Grand Union Canal Conservation Area and their settings; proposed locally listed buildings of the Former Railway Institute, Fisherman's Arms Public House, Stoke Place Terrace and 1-17 Farley Buildings; and proposed Area of Local Character at Wells House Road. ii) ensuring future local character is informed by the area's existing heritage including the railways, Grand Union Canal, residential and industrial heritage" yet there is no mention at all of enhancing Midland Terrace and Shaftesbury Gardens or how these residential areas should be enhanced when the policy is calling for 2,600 new homes in this area and there is no discussion of a buffer around existing communities which we have previously called for. TITRA believes that Policy P8 is inadequate.
224	571	Local Resident	Alison	Brayshaw			P8		Additional homes will have a detrimental effect on our already existing fly-tipping/fly/rodent problem in our area.
224	572	Local Resident	Alison	Brayshaw			P8		Our area (REF - Goodhall Street) should be protected being a conservation area
225	636	Local Resident	Marta	Donaghey			P8		I reject Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.

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227	686	Local Resident	Jamie	Sutcliffe			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
28	701	Strategic Partner	Lucinda	Turner	Transport for London		P8		TfL strongly supports the retention of both the SIL designation and the bus garage use on the site at Willesden Junction referred to in policy P8. The bus garage is important in maintaining the local bus network and providing well located capacity to help meet the demands from the significant growth taking place and planned in the area.
28	741	Strategic Partner	Lucinda	Turner	Transport for London		P8	Policy part c (i) and Figure 4.27	TfL strongly supports the retention of both the SIL designation and the bus garage use set out in P8 part c (i). The bus garage is important in maintaining the local bus network and providing well located capacity to help meet the demands from the significant growth taking place and planned in the area. It would be helpful to further clarify that only TfL will be able to decide whether the bus garage is still required based on the requirements of the existing and future planned bus network As stated in OOL.5 there would need to be agreement with TfL that the site is no longer required for a bus garage or that an equivalent in terms of capacity, facilities, terms and location is agreed with TfL before the existing site could be considered for redevelopment for non-bus use
119	873	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P8	Fig. 4.27	The widening of Old Oak Common Lane to include generous footpaths and segregated cycle lanes would be desirable but as Scrubs lane below it is unclear if this means a loss of open space. Figure 4.27 should be clear where the proposed path is to be located. And show no new access onto the scrubs until GIOSSMP is agreed
119	874	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P8	OOL.9	Wormwood scrubs is more than a roadside space
119	875	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P8	ii)	Given its proximity to the Scrubs the Heritage and character of the scrubs should be mentioned in ii)
107	884	Residents Association	Mark	Walker	TITRA		P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming given such high-density homebuilding, that there is no discussion of a buffer around existing residential communities which our association and others have previously called for.
107	903	Residents Association	Mark	Walker	TITRA		P8		Policy P8 claims to protect the Old Oak Lane and Old Oak Common Lane communities' local heritage and character by: i) conserving and enhancing the: Old Oak Lane Conservation Area, Grand Union Canal Conservation Area and their settings; proposed locally listed buildings of the Former Railway Institute, Fisherman's Arms Public House, Stoke Place Terrace and 1-17 Farley Buildings; and proposed Area of Local Character at Wells House Road. ii) ensuring future local character is informed by the area's existing heritage including the railways, Grand Union Canal, residential and industrial heritage yet there is no mention at all of enhancing Midland Terrace and Shaftesbury Gardens or how these residential areas should be enhanced when the areas will be transformed by the building of HS2 Old Oak Common Interchange while the policy is calling for 2,600 new homes in this area and there is no discussion of a buffer around existing communities which we have previously called for. TITRA also believes that Policy P8 needs to have dedicated policies to try to safeguard Wells House Road and from the quarter's transformation by HS2 – Policy P8 is therefore inadequate.
228	913	Local Resident	Pablo	Navarrete			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
114	917	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		P8		1.2 Consideration has not been given to the impact on existing residents who are not against the development but believe they should be safeguarded against worst and permanent impacts. 1.3 Policy P8 claims to protect the Old Oak Lane and Old Oak Common Lane communities' local heritage and character by: i) conserving and enhancing the: Old Oak Lane Conservation Area, Grand Union Canal Conservation Area and their settings; proposed locally listed buildings of the Former Railway Institute, Fisherman's Arms Public House, Stoke Place Terrace and 1-17 Farley Buildings; and proposed Area of Local Character at Wells House Road. ii) ensuring future local character is informed by the area's existing heritage including the railways, Grand Union Canal, residential and industrial heritage yet there is no mention at all of enhancing Midland Terrace and Shaftesbury Gardens or how these residential areas should be enhanced when the policy is calling for 2,600 new homes in this area and there is no discussion of a buffer around existing communities which we have previously called for. We therefore believe that Policy P8 is inadequate.
114	924	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		P8		2.7. We completely reject Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which we have previously called for. Midland Terrace is an existing community which should be treated as a sensitive edge and protected rather than having everything imposed on it. By allowing the bridge and tall buildings in such close proximity the quality of life for residents will be greatly reduced.
95	994	Local Resident	Mark	Walker			P8		On similar grounds, I think Policy P8 is ineffective because there is no strategic vision for protecting Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this small area. With high-density housing being the hallmark of this plan, it is unacceptable that there is still no discussion of a buffer around existing residential communities.
35.b	1037	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	P8		As referred to above, the development of Oaklands also delivers on the vision for Old Oak Lane and Old Oak Common Lane and on the various aspects of the Policy. This includes the early delivery of new homes, commercial space, public open space and the first phase of Park Road. The fact that this development has now commenced should be acknowledged in the supporting text. The continued development of Oaklands North could also come forward concurrently if promoted now and add to the benefits arising.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
35.b	1038	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	P8C1		The same points apply as for Policy P8, with the Oaklands development needing greater recognition; so to the early potential to deliver Oaklands North.
101	1103	Local Resident	Jason	Salkely			P8		I reject Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
56	1144	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P8		This policy is the only one that makes reference to the delivery of green infrastructure and linear spaces. Make similar reference to green infrastructure and linear spaces in the other policies where relevant.
56	1145	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P8		The supporting text makes specific reference to inclusion of roadside green infrastructure and linear spaces, highlighting that these areas can provide new and enhanced ecology and spaces to support air quality, resilience to climate change and visual amenity. This specific reference to roadside green infrastructure features is welcomed. Make similar references to roadside green infrastructure in the other policies where there is scope to integrate multifunctional green infrastructure into new streets.
56	1146	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P8C1		This policy also includes a reference to green infrastructure providing resilience to climate change impacts, which is welcomed. The climate change resilience reference could be included in all other policies in this section.
56	1147	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P8		There is scope to make more of the need to use open space and green infrastructure to provide a range of functions. As currently worded, it feels like the multi-functional benefits that can be provided, which include (but are not limited to) flood management are not highlighted in the policy, although there are references to biodiversity and ecology. This aspect is discussed in the supporting text where there is a reference to SuDS, but the policy wording could be strengthened to stress the multifunctional role that open space and green infrastructure need to play in the OPDC area. Refer to SuDS in the policy in the same way it is referenced in the supporting text.
234	1302	Local Resident	Elaine	Gristock			P8		Policy P8 is totally inadequate when looking at protection of Old Oak's existing communities' local heritage and character. Local residents have called for buffer zones around the existing communities, but that has been ignored.
234	1305	Local Resident	Elaine	Gristock			P8		The community represented by TITRA feels run down by the effects of development so far - and it has only just begun. There is stress and anxiety in our lives as a result of decisions that have already been made and decisions that are looming. You run the risk of inflicting a totally negative experience upon us for the next 15 years
103	1340	Local Resident	David	Turner			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
89	1350	Local Resident	Nicky	Guymmer			P8		TITRA rejects Policy P8 which has a wholly inadequate discussion of how to protect the Old Oak's existing communities' local heritage and character, especially Midland Terrace, when the OPDC is calling for 2,600 new homes in this area. It is alarming that there is no discussion of a buffer around existing communities which our association has previously called for.
110.b	1481	Community Group	Robin	Brown	Grand Union Alliance		P8		Adverse impact of Old Oak Common Lane Station and access thereto on amenity of Midland Terrace and Shaftesbury Gardens compounded by the uncertainty of the design solution for Old Oak Street as it crosses the railways.
110.b	1482	Community Group	Robin	Brown	Grand Union Alliance		P8		At Atlas Junction, there is support for the triangular site bounded by railways and canal to be an open space to cater for the residential development at the Oaklands and elsewhere, rather than as a further development site.
110.b	1483	Community Group	Robin	Brown	Grand Union Alliance		P8		Designation and protection of Harlesden Bus Depot as SIL is to detriment of the integration and connecting of the areas that lie to the north and south of the railways.
110.b	1484	Community Group	Robin	Brown	Grand Union Alliance		P8C1		Whereas Atlas Junction Cluster has its own Policy P8C1 with focused diagrammatic map, fig. 4.30, the Old Oak Common Lane Station Cluster does not. Notwithstanding that it adjoins two significant existing residential enclaves and close to a third which require careful consideration in order to establish appropriate planning relationships.

P9 Channel Gate

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
209	161	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited; who are the, freehold owners of the sites of Plantagenet House and Stuart and Windsor House, Victoria Road, shown on the attached plan. The sites are located on the west side of Victoria Road, immediately north of the current freight rail line and opposite the established residential areas of Shaftesbury Gardens and Midland Terrace.	P9		1. These representations re submitted on behalf of Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited; who are the, freehold owners of the sites of Plantagenet House and Stuart and Windsor House, Victoria Road, shown on the attached plan. The sites are located on the west side of Victoria Road, immediately north of the current freight rail line and opposite the established residential areas of Shaftesbury Gardens and Midland Terrace. 2. The Site is required by HS2 as a work site for construction purposes. As an alternative to permanent land take through compulsory purchase, an agreement has been reached between the five owners and HS2 for a temporary possession of the sites to allow HS2 to undertake various construction activities related to the building of the railway. HS2 are demolishing the existing buildings to accommodate their construction activities and will hand back a cleared site to the freeholders at the end of the construction period.

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209	162	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	P9		3. Upon vacation by HS2 the Site will become available for new development. Proposals will be assessed in the context of the Local Plan and it is important that policies provide sufficient flexibility for the site to contribute positively to OPDC's strategic planning and regeneration objectives including its aspirations for place making.
209	163	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	P9		4. The sites lies within a Strategic Industrial Land designation in the Channel Gate Place (P9). The SIL designation reflects the area's former use providing warehousing with ancillary studios/ workshops/ offices. We fully acknowledge the importance of SIL but also welcome the recognition that designated employment land needs to be able to respond to new demands for flexible and adaptable space, embracing new technologies and capable of accommodating change. 5. This flexibility, however, should be extended to allow other land uses including residential along the fringe of the designation, for the following reasons:
209	164	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	P9		<ul style="list-style-type: none"> • Being on the outer edge of SIL, the Site lies in an important area of transition between the existing residential neighbourhoods to the east and the main Park Royal industrial estate to the west. This transition is characterized by changes that have already taken place and those proposed in the draft Plan, for example: <ul style="list-style-type: none"> o Development of The Collective Old Oak, providing over 500 homes o The new Atlas Junction Cluster and town centre focused on Victoria Road and the Canal.
209	165	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	P9		<ul style="list-style-type: none"> • Victoria Road is a key north-south route through the area. Development fronting the road has an important role to play in placemaking. This can be assisted positively though careful attention to spatial layout, architectural design and landscaping. However, land use is fundamental – informing how spaces and buildings are inhabited and influencing patterns of movement across the day and throughout the week. The introduction of mixed-use development with employment, residential, retail and other public uses lining and defining the main routes will generate activity and vitality inside and outside of conventional working hours and contribute to creating an attractive environment that encourages walking and cycling.
209	166	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	P9		<ul style="list-style-type: none"> • Allowing a mix of employment, residential and other uses will facilitate the intensification that the Plan seeks to achieve and promote. This approach can achieve many of the Local Plan objectives, including: <ul style="list-style-type: none"> o Contributing to healthy streets and quality public realm that supports social interaction and encourages inclusivity in accordance with Policy SP7 and para 4.6. o Introducing high density mixed use development and potential layering of uses to help deliver the quantum of housing expected in the Opportunity Area, in accordance with para 3.21. o Recognising that diversity of character can support a range of employment opportunities across different sectors and improves economic resilience, in accordance with para 3.26. o Integrating mixed use in a way that avoids compromising opportunities for new employment floorspace with scope to exceed 15,750 sqm previously on Site. This may include co-working floorspace together with smaller, flexible units that will help to intensify employment elsewhere in the SIL in accordance with policy SP5. o Increasing the employment potential of the Site and creating more jobs than hitherto, in accordance with policy E1. o Similarly, developing the Site in a way that is compatible with employment use on neighbouring land within the industrial estate thereby protecting SIL and recognising the 'agent of change' principle in accordance with para 9.11. The railway along the west side of the Site provides a buffer to the southwest. o Assisting gradations of industrial and employment uses across the large extent of Park Royal so that distinct business groupings and character areas can emerge. This is important to avoid the amorphous character that too often accompanies industrial locations. o Delivering housing in different typologies, across a range of tenures including potential for affordable housing to help meet need at a strategic and local level, in accordance with policy SP4. o Contributing to mixed inclusive communities in accordance with policy SP2. o Developing housing designed to achieve a high quality living environment for new residents and development that responds sensitively to protect amenity for existing residents. o Generating interesting and active frontages that enliven the street at different times of the day/ evening throughout the week. o Increasing the catchment population to be served by Atlas Junction neighbourhood town centre, helping to sustain new local shops, services and amenities.
209	167	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	P9		6. We request changes to the draft Plan to reflect the above. We propose that the sites fronting Victoria Road should be included within the area to be de-designated from SIL, as is proposed for sites nearby along Victoria Road and shown in figure 9.4. Instead these sites should be promoted for mixed-use development that will serve both to promote Victoria Road as a local high street and will act as a moderating transition zone between the Old Oak and Park Royal policy areas. This would represent continuity in respect of the already proposed policy approach along the west side of Victoria Road and provide the flexibility required for high quality developments on the sites to mediate successfully between safeguarded housing and industrial areas. It will also enable the sites to be developed in a manner that is consistent with the Vision for Channel Gate without in any way compromising the development objectives for SIL or undermining the supported SIL policy as otherwise set out in the draft Plan.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
209	168	Planning Consultant	Chris	Horn	Chris Horn Associates Limited	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	P9		7. We wish to reserve our position to expand upon these representations at further stages in the Local Plan process.
90	244	Local Resident	John	Cox			P9		The planned bridge over the Grand Union Canal should be moved to the east, so the line of its road more naturally becomes part of a A4000 bypass, to the west of the Island Triangle estate.
115	300	Local Resident	Nye	Jones			P9		Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
210	310	Local Resident	Gail	Dobinson			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
212	320	Local Resident	Natasha	Salkey			P9		Policy P9 is inadequate. I would like to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
213	328	Local Resident	Rachel	Ritfeld			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
213	344	Local Resident	Rachel	Ritfeld			P9		TITRA believes that Policy P9 is inadequate. While we welcome the Policy P9 vision for a strengthened connection / bridge between Atlas Road and the Channel Gate Yard, we would like to see firm plans for the closure of Channel Gate Road and access to the yard solely by Atlas Road after HS2's construction work is complete. Closing the Channel Gate Road would be the single most important way to protect and enhance the Old Oak Conservation Area
214	352	Local Resident	Ciara	Solmi			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
32	390	Local Resident	Bernie	Timmins			P9		I believe that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
219	449	Local Resident	Jane	Dreaper			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area. CHANNEL GATE ROAD IS A MESS. LORRIES SIT THERE WITH ENGINES IDLING, EALING COUNCIL DOESN'T BOTHER ENFORCING THE DOUBLE YELLOW LINES THERE, AND PEOPLE USE IT FOR FLY-TIPPING. YOU HAVE AN OPPORTUNITY HERE TO MAKE A POSITIVE DIFFERENCE - PLEASE TAKE IT.
220	458	Local Resident	M.	Szoke			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
221	467	Local Resident	James	Trew			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
221	483	Local Resident	James	Trew			P9		TITRA believes that Policy P9 is inadequate. While we welcome the Policy P9 vision for a strengthened connection / bridge between Atlas Road and the Channel Gate Yard, we would like to see firm plans for the closure of Channel Gate Road and access to the yard solely by Atlas Road after HS2's construction work is complete. Closing the Channel Gate Road would be the single most important way to protect and enhance the Old Oak Conservation Area
222	487	Local Resident	Stephanie	Hewett			P9		Policy P9 - the guaranteed permanent closure of channel gate road once HS2 leave and permanent alternative access via Atlas road is an absolute MUST for the TITRA local community. We have suffered for years with the dust and debris created by hundreds of lorries a day using this road, not to mention the risk to life as anyone crossing that road (before HS2 moved in) quite literally took their lives in their hands. Children have no place to play safely and are at risk playing on the side of the road, we have no local park space. Channel Gate road should be permanently closed and transformed into a park.
223	553	Local Resident	Eileen	Hannington			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
223	569	Local Resident	Eileen	Hannington			P9		TITRA believes that Policy P9 is inadequate. While we welcome the Policy P9 vision for a strengthened connection / bridge between Atlas Road and the Channel Gate Yard, we would like to see firm plans for the closure of Channel Gate Road and access to the yard solely by Atlas Road after HS2's construction work is complete. Closing the Channel Gate Road would be the single most important way to protect and enhance the Old Oak Conservation Area
225	637	Local Resident	Marta	Donaghey			P9		I believe that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
227	687	Local Resident	Jamie	Sutcliffe			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
107	885	Residents Association	Mark	Walker	TITRA		P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area but it is not considered in a meaningful way.
107	904	Residents Association	Mark	Walker	TITRA		P9		TITRA believes that Policy P9 is inadequate. While we welcome the Policy P9 vision for a strengthened connection / bridge between Atlas Road and the Channel Gate Yard, we need to see firm plans for the closure of Channel Gate Road and access to the yard solely via Atlas Road after HS2's construction work is complete. Closing the Channel Gate Road would be the single most important way to protect and enhance the Old Oak Conservation Area. Policy P9 (p117) states that it will use: "a variety of building heights which support the vision for a high density industrial area while not adversely impacting on residential amenity by delivering: i) heights to accommodate a range of high density industrial uses; ii) lower heights fronting onto the Grand Union Canal to conserve and enhance its designation as a Site of Importance for Nature Conservation and conservation area; and iii) lower heights adjacent to the Island Triangle" but the policy does not state what these lower heights are. Since the OPDC shunted through approval for the QPR / Genesis Oaklands building – which at its maximum 26 storeys is 13 times the scale of the Old Oak Lane Conservation Areas 2-storey cottages – TITRA regards this section of Policy P9 as inadequate until guideline heights are discussed openly, consulted on and then included.
228	914	Local Resident	Pablo	Navarrete			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
114	925	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		P9		2.8. We believe that Policy P9 is inadequate and support TITRA residents in calling for closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
95	995	Local Resident	Mark	Walker			P9		I think Policy P9 is misguided; there should be a commitment to closing Channel Gate Road and creating access to the railway yard solely by Atlas Road after HS2's work at the yard is complete. This move represents the single most important way that the OPDC could protect and enhance the Old Oak Conservation Area but it is not considered in a strategic or meaningful way in the plan.
101	1104	Local Resident	Jason	Salkely			P9		I believe that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
234	1303	Local Resident	Elaine	Gristock			P9		Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
103	1341	Local Resident	David	Turner			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
89	1351	Local Resident	Nicky	Guymer			P9		TITRA believes that Policy P9 is inadequate: we want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.
110.b	1485	Community Group	Robin	Brown	Grand Union Alliance		P9		An opportunity to create a purposeful buffer between Park Royal and the heritage residential areas by fine grained employment activities and new residential as appropriate.
110.b	1486	Community Group	Robin	Brown	Grand Union Alliance		P9		Relocate the road access serving that part of the area north/northeast of the canal away from 'The Island Triangle' where it presently disruptively splits off some of the residential area from the larger part.

P10 Scrubs Lane

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	199	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P10	D) ii)	Public realm and movement part D) ii) states as an objective 'contributing to the delivery of a new continuous generous 5 metre wide footpath along the west of Scrubs Lane'. This is more than what has been discussed with the OPDC to date and could limit development in certain areas. We will need to test whether this width is achievable.
42	200	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P10C2		This policy now reflects the provision of a new all modes link connecting Park Road to Scrubs Lane at Laundry Lane. We consider that this link has significant delivery challenges and await clarity from OPDC on its deliverability before we can provide our support for it.
42	201	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P10C2		We would question the desire for 'conserving and enhancing the heritage significance of 26-30 Scrubs Lane and existing ghost signage in accordance with Policy D8' in respect of the delivery of Park Road. Please see our later comments on policy D8.
42	202	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	P10C2	LLC.5	Supporting text at paragraph LLC.5 states that 'Publicly accessible open space should be delivered within this cluster to support the strategic target to deliver 30% publicly accessible open space (see Policy SP8), help to mediate the level changes required along Park Road to bridge over rail infrastructure and support the delivery of east-west walking and cycling connections between Old Oak North, Scrubs Lane and St. Mary's Cemetery.' The extent of the cluster is unclear. To provide 30% of publicly accessible open space on this area could mean that 30% of Cargiant's plot north of Park Road on Scrubs Lane should be open space, which could be excessive for such a small plot. We have queried the 30% requirement elsewhere within the Plan, but would generally request that publicly accessible open space targets are applied across the planning application area as a whole, not to subareas as well.
92.b	437	Community Group	Melanie	Whitlock	The Hammersmith Society		P10		Policy P10 Scrubs Lane Supporting text para 4 –. There is no explanation in the Track changes as to why the number of jobs and homes has been increased.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
47	585	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		P10		P10: Scrubs Lane, P10C1: Harrow Road Cluster P10C2: Laundry Cluster: P10 C3, P10C3: Hythe Road Cluster, P10 C4 Within the subsections on Building heights e) for each of these policies and Table 4.2 we remain concerned about the impact of proposed single tall buildings and clusters on the setting of Kensal Green Cemetery which is a Grade 1 Listed Historic Park and Garden containing 152 listed buildings and monuments and heritage assets. The wider "appropriateness" of tall buildings and specific storey heights in these policies and Table 4.2 and Figure 3.15 have not been evidenced or tested outside of the OPDC. In the context of co-operation and justification the policies do not take account of the wider cross Borough impact and potential harm to the heritage assets and scale of the neighbouring RBKC townscape.
9.b	640	Statutory Consultee	Katie	Parsons	Historic England		P10		We are particularly concerned with the two locations for tall buildings shown towards the south of Scrubs Lane on fig. 3.15 (pg 41). We previously raised serious concerns in response to proposed tall buildings in this location. In our view the proposals would cause harm to the significance of the Cumberland Park Factory Conservation Area, St Mary's Conservation Area (containing St Mary's Catholic Cemetery), the Grade I Registered Park & Garden (and Conservation Area) of Kensal Green and, where there would be inter-visibility with any subsequent tall building, the listed mausolea and monuments therein. A positive aspect of the setting of both cemeteries is their relatively quiet, solemn, private and contemplative character. The wider setting is predominantly of trees and lower scaled buildings. As such, we remain pleased to see that this location is identified as a sensitive edge and that the policy does seek to conserve and enhance heritage assets in the area. However, the impacts associated with the dominant massing, scale, and intrusive visual impact of tall buildings in the locations highlighted would result in harm to the setting of these irreplaceable heritage assets, negating this policy objective. In our view, lower less dominant buildings would be more appropriate in these locations and would respond better with the immediate setting of the nearby heritage assets as well as the existing scale of the area, much of which won't change. It would be useful to explore alternative types of development which can still deliver the public benefits desired but which are not in the form a tall building.
9.b	641	Statutory Consultee	Katie	Parsons	Historic England		P10		As outlined above, we remain concerned about the position of tall buildings along Scrubs Lane and those objections are reiterated again in relation to part g of the policy. In particular we are concerned about the justification for a single tall building to be located within each cluster of development as promoted by part g (v). The deletion of part f (vi) which requires the delivery of visual permeability between tall buildings is also of concern given the potential impacts this will have on townscape, views and visual amenity of the area. We are keen to avoid the formation of a wall of a development and part f would go some way to safeguarding against this.
9.b	642	Statutory Consultee	Katie	Parsons	Historic England		P10		It is acknowledged that the rationale behind the requirement for a single tall building in each cluster is to prevent the uncoordinated delivery of tall buildings along Scrub's Lane or the delivery of increased heights and massing along the length of Scrub's Lane. However, we have raised concerns with the principle of tall buildings in this area and therefore we do not consider this to be a convincing approach that will promote sustainable development.
9.b	643	Statutory Consultee	Katie	Parsons	Historic England		P10		We also have concerns about how this policy can be implemented, for example what constitutes a cluster of uses and will this change throughout the Plan period?
9.b	644	Statutory Consultee	Katie	Parsons	Historic England		P10		We very much welcome the supporting text of paragraph 13 regarding the historic character of the Cumberland Park Factory Conservation Area; however the requirements of the text should ideally be incorporated as a policy criterion in part f of the policy itself.
28	742	Strategic Partner	Lucinda	Turner	Transport for London		P10	Policy part d, Figure 4.34 SL8 & SL9	TfL supports the intention to provide improved cycling and facilities along Scrubs Lane to connect with the wider cycle network and strategic cycling routes. It will be important that any changes to Scrubs Lane do not have a significant negative impact on bus journey times or reliability as this is an important route for buses serving the area, including Old Oak North, Old Oak South and Old Oak Common Station.
28	743	Strategic Partner	Lucinda	Turner	Transport for London		P10C2	Policy part b (i) and LLC2	This refers to delivering Park Road and Laundry Bridge as an all modes route as a priority. The policy and supporting text should note that if delivering this route as an all modes route is not feasible then an alternative and additional all modes access to Scrubs Lane would be required. This would be critical for delivery of the bus strategy for the area and achieving early public transport accessibility and connectivity to the site. Also for providing good walking and cycling connectivity into the site from Scrubs Lane.
28	744	Strategic Partner	Lucinda	Turner	Transport for London		P10C3	Policy part b (i) and HC1	TfL welcomes support for enhancing Hythe Road as an all modes key route. Request that specific mention is made of the need for enhancements to allow double deck buses to use this route as this is a requirement for allowing the bus strategy for the area to be delivered.
119	876	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P10		A 5m wide footpath and 4m wide cycle lane is proposed 'where possible'. This would be desirable if there is no encroachment onto the Scrubs. If this means a loss of public open space or vegetation it needs to be considered in detail including what improvements to green infrastructure can be made. Figure 4.34 should be clear where the proposed path is to be located. And show no new access onto the scrubs.
35.b	1039	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	P10		We support the vision for early delivery of new development along Scrubs Lane, in particular the Laundry Cluster (Policy 10C2).

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
105	1084	Community Group	Del	Brenner	Regents Network		P10C4		<p>A cycle bridge by stealth The OPDC planners have slipped in a cycle bridge over the canal at Mitre Bridge, shown by the blue arrow and hidden by the bridge label.</p> <p>The bridge is not suitable, nor legitimate as it has not been consulted on. In fact the exact location and details of the bridge have not been revealed, and the worry is that the bridge is being promoted by stealth.</p> <p>The secret bridge and the cyclist approach route will encroach on the Mary Seacole Memorial Garden, but, without drawing attention to itself.</p> <p>It is suggested that OPDC should be dealing in depth with this bridge in the Local Plan to ensure than the Memorial Garden is enlarged and enhanced to a respectful extent. The extended garden can be secured by way of Condition through the planning system and would only be a relatively small impediment to any developer involved.</p> <p>It is important that OPDC does the right thing rather than furtively removing of a strip of the memorial garden for a cycle access! This may result in a serious and active reaction from local residents and the wider community.</p>
56	1149	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P10		The reference to “delivering green connections into wider areas” and also the reference to implementing SuDS to minimise the impacts on the sewer network have been removed and it is not clear why. Consider re-instating this text.
56	1150	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P10		“Contributing to a variety of building heights which respond to public transport access and sensitive locations by delivering: v) a single tall building....” This does not read as a reasonable response to sensitive locations. Also it is too prescriptive as cumulative impacts on sensitive areas to the east and on skyline and townscape matters are not assessed. Policies P10C1-C4 too obviously retrofit approved decisions with a justification. More appropriate and valid reasons need to be added here.
56	1154	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P10C3		No comments in addition to those already made – i.e. refer to the need for open space to be multi-functional, to take a range of forms where appropriate, including small-scale and roadside and to incorporate SuDS features.
56	1155	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P10C4		Given that this is a canalside site where surface water will be directed as part of the SuDS Strategy, there should be a reference to this in the Policy and Supporting Text. Include references to the use of the canal as part of the SuDS Strategy in the Vision and Policy.
110.b	1487	Community Group	Robin	Brown	Grand Union Alliance		P10		SP10 para SL1, SL3: New development likely to only superficially acknowledge employment heritage by its choice of materials, but will displace existing businesses. Delivery of affordable workspace is inadequately specified and would compete with delivery of affordable housing and social infrastructure.
110.b	1488	Community Group	Robin	Brown	Grand Union Alliance		P10		Improvement of N-S connection focused on segregated cycle route and pavement widening, but E-W connections with Old Oak/Car Giant site will create additional junctions and traffic whose consequences have been underestimated, creating a barrier between new and existing communities. Scrubs Lane highly constrained as a multipurpose highway, but will provide 2 of the 4 major entry points into Old Oak North and South. This is the same proposed situation for Old Oak Common Lane. The new Hythe Road Station is not certain; supporting a new Overground Station at White City roundabout would assist in improving connectivity (PTAL levels).
110.b	1489	Community Group	Robin	Brown	Grand Union Alliance		P10		Identification as a sensitive location no longer reflected by a lower density representing the outer edge of a gradient rising to core of Old Oak. Whilst still sensitive, inappropriately high buildings of 6 – 10 storey heights generally plus one tall building in each of the 4 clusters are now promoted. Although clustering active frontage uses could reduce spread of under occupation, the benefits and rationale for tall buildings such as way finding are disputed. Change in policy approach appears to meet developer needs. Draft Direction of Travel for Scrubs Lane document not part of plan-making consultations.
110.b	1490	Community Group	Robin	Brown	Grand Union Alliance		P10		Development responses (planning applications) to policy are premature, piecemeal and inadequate with minimal affordable housing when compared with Mayoral ambition for 50% affordable housing (e.g. North Kensington Gate South’s 37 shared ownership + 7 London Living Rent + 164 private units). Developments only marginally contribute to overall targets and ambitions of the draft Local Plan.
110.b	1491	Community Group	Robin	Brown	Grand Union Alliance		P10C3		P10C3 Hythe Road Cluster: The haul road that sweeps around the northern edge of Old Oak North to Old Oak sidings waste Site (Powerday), which is to be safeguarded for the plan period (see OON.25), will enter Scrubs Lane in the midst of the approved ‘Mitre Yard’ 104-108 Scrubs Lane (17/0055/FUMOPDC) development. This will effectively sever its northern and southern parcels and its use by frequent industrial vehicles, as Powerday is planned by the OPDC to process construction waste from Old Oak etc. as well as other waste streams, interrupt the free flow of pedestrians, cyclists and other road users along Scrubs Lane, as well as degrading the environment and amenity of the development and vicinity.
110.b	1492	Community Group	Robin	Brown	Grand Union Alliance		P10C4		P10C4 Mitre Canal-side Cluster: It is not only the proposed walking and cycling route along the north side of the canal and adjoining publicly accessible active community, leisure and eating/drinking uses that should be taken into account when enlarging and enhancing Mary Seacole Gardens, but also the proposed North- South cycling facilities along the western side of Scrubs Lane. Only £25,000 S106 monies allocated from the above planning permission towards its refurbishment

P11 Willesden Junction

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
23	114	Local Authority	Muhammed	Butt	London Borough of Brent		P11		Brent Council previously objected on the grounds the Plan does not give certainty Willesden Junction Station will come forward within its lifetime. This is despite the supporting Infrastructure Delivery Plan identifying the station needs to come forward within the lifetime of the Plan, in phase 0-10 years and 10-20 years. Furthermore, the OPDC Retail and Leisure Needs study acknowledges at paragraph 7.7.4 'To enable Harlesden to capture regenerative benefits from investment at Old Oak, it is critical for physical and functional linkages to be improved. If the linkages are not improved, then there is unlikely to be any significant benefit to Harlesden from development within the OPDC area and the regeneration aims in the London Plan may not materialise.' Since the Council raised its objections a steering group has been established for Willesden Junction. However, we are disappointed to note Willesden Junction and the surrounding land is still not included as a site allocation or in the phasing plan shown in figure 3.16. This is despite the phasing plan including sites which are to be delivered in 21+ years. This suggests Willesden Junction is not factored into delivery at all. If Willesden Junction does not come forward within the lifetime of the Plan this is contrary to proposed policy SP10 Integrated Delivery which requires 'proposals to enable a comprehensive integrated approach to the delivery of development and infrastructure that C) contributes appropriately and proportionately towards required infrastructure identified in OPDCs Infrastructure Delivery Plan (IDP) at a rate and scale sufficient to support the area's development and growth.'
23	116	Local Authority	Muhammed	Butt	London Borough of Brent		P11		Change sought: For Willesden Junction Station to be included in the earlier phases in the phasing plan in figure 3.16 and as a site allocation to come forward in years 0-20 reflective of the OPDC Infrastructure Delivery Plan. The Plan should not prejudice over-station development which should be explicitly supported in the policy and/or site allocation.
90	238	Local Resident	John	Cox			P11		Incidentally, it is ridiculous that Willesden Junction station platforms are split between three 1965 London boroughs, due to parish boundaries when the station was built in 1866. That station has also greatly suffered as a result. For instance, it was impossible for years to get a major 'temporary' water main removed from across the entrance of Station Approach (privately owned by Railtrack) because it is in LB of Hammersmith & Fulham, but more than a kilometre away from any other road of that borough. The pipe was less than a metre away from LB of Ealing, but neither borough was interested, and the local economy suffered as a result.
28	696	Strategic Partner	Lucinda	Turner	Transport for London		P11		Joint work is continuing to examine what capacity, passenger experience accessibility and connectivity upgrade measures are needed at North Acton and Willesden Junction Stations. Work is also ongoing considering service enhancement options for the North London and West London Lines line to accommodate the forecast passenger growth which may include new rail infrastructure and rolling stock. TfL is pleased to note that a summary of the latest findings from the North Acton Station Feasibility Study and the Willesden Junction Station Feasibility Study are included as part of the Local Plan Evidence Base. As previously requested, rather than referring to a station square as the preferred design solution for new or redeveloped stations, the wording should be more flexible to allow for alternative public realm solutions that may emerge from design and development work.
28	745	Strategic Partner	Lucinda	Turner	Transport for London		P11	Policy part j, Figure 4.44, WJ 8 – 12, WJ 15 - 16	The policies and supporting text for Willesden Junction are broadly consistent with TfL's aspirations for the interchange. Potential improvements at Willesden Junction station and in the surrounding area have been informed by the findings of the Willesden Junction station feasibility study. Supporting text in this section should note that further feasibility work is required by TfL, OPDC, NR and other stakeholders to agree a preferred option for improvements at Willesden Junction station and in the surrounding area. Some key issues will need to be agreed at this stage between the key stakeholders to allow for the feasibility work to continue. These are things such as agreements on expected future station demand, the finalised masterplan for Old Oak North and other possible infrastructure/development changes around the station. Any preferred option will need to be both viable and deliverable taking into account the needs of current and future transport operations and involve full consultation with relevant transport authorities and providers. We look forward to working with OPDC, Network Rail and other stakeholders on this.
28	746	Strategic Partner	Lucinda	Turner	Transport for London		P11	Policy part j, Figure 4.44, WJ 8 – 12, WJ 15 - 16	The Willesden Junction Train Maintenance Depot is a critical piece of operational rail infrastructure that supports delivery of London Rail services. This will remain the case for the foreseeable future. As part of our work looking at potential future service capacity enhancements on the North and West London Lines we are also assessing future operational stabling requirements on this site. Therefore TfL welcomes recognition that development on the Willesden Junction Train Maintenance Depot is not proposed to come forward in the local plan period.
28	747	Strategic Partner	Lucinda	Turner	Transport for London		P11	WJ12 and Figure 4.44	Station Entrance / Square / Interchange to the east of the station. Note that this is subject to further feasibility work and other work referred to above which will help clarify existing and future operational railway requirements on sites in this area
35.b	1040	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	P11		We support the vision for Willesden Junction. However, we consider the station improvements and critically the delivery of a new bridge link to Old Oak North to the south should be a stated early priority for the Local Plan. This connection will, in its own right, serve to significantly enhance the accessibility of Old Oak North and also facilitate the early development of the EMR site.
56	1156	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P11		Reference to delivering a high quality, well-connected, network of multifunctional publicly accessible open spaces and embedding green infrastructure along specific streets is welcomed.
110.b	1493	Community Group	Robin	Brown	Grand Union Alliance		P11		P11 Vision: The critical improved links with Harlesden to mitigate adverse impact of Old Oak Metropolitan/ Major Town Centre on Harlesden Town Centre - are not sufficiently explicit. There is a lack of certainty on how the Harlesden Enhancement Strategy will be achieved. Consequently, Harlesden, in need of upgrading of its public realm, facilities and connections, will be eclipsed.
110.b	1494	Community Group	Robin	Brown	Grand Union Alliance		P11		Designation and protection of Harlesden Bus Depot as SIL is to detriment of amenity and ease of movement for Station Road/Harlesden. This should be released from SIL designation in order to enable mixed use development that would, improve other things, the linkage between Harlesden Town Centre, Willesden Junction and Old Oak by not only negating the severance effect of the depot entrance with the creation of an active frontage (which is proposed). But also release a site more than sufficiently deep for the potential location of mid-sized budget priced supermarket which would usefully augment the range and depth of the shopping offer of Harlesden.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
110.b	1495	Community Group	Robin	Brown	Grand Union Alliance		P11		P11e), g), j): Protecting the potential for more stopping trains at Willesden Station on the West Coast Main Line and possibly other parts of the station is welcomed. However, there are potential policy conflicts between heritage conservation and promotion of early development. Uncertainty as to siting, integration and acceptability of new high density development/new mixed use neighbourhood, particularly in respect of existing surroundings which include low rise housing and, across the railway, a retained Powerday recycling/energy from waste plant.
110.b	1496	Community Group	Robin	Brown	Grand Union Alliance		P11		Policy P11 e): refers to fig.44 which does not depict a cycling route east to the Harrow Road unlike to the west. Both directions need to be of the same functionality.
120	1599	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		P11		You, however, know our concern that a link between the OPDC area with Harlesden neighbourhood is intentionally made.

P12 Wormwood Scrubs

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
6	1	Local Resident	Robert	Covell			P12		Just looked through the amended consultation. With regard to Wormwood Scrubs. I appreciate the general thrust of the proposal is a gentle enhancement. I have three points. 1/ The north side (to the west) is very wild on the embankment which leads up to the railway. What protection will there be for the wildlife that lives and feeds in that area.
6	2	Local Resident	Robert	Covell			P12		2/ The north side from the centre to the East, is a wooded area, running thinly around to the East side. This woodland habitat is pretty rare for this local area, and needs protection.
6	3	Local Resident	Robert	Covell			P12		3/ Has any representation been made with local wildlife groups (such as London Wildlife Trust) to ascertain if construction of a wildlife/nature water feature, such as a pond and/or marsh land, albeit not on a large scale, could add to the wildlife/nature and draw more wildlife to it, and be a nature and educational feature for the area and young people. I wonder also, in view of the amendment's reference to the Scrubs being prone to flooding, if drawing the water to a wildlife capture area, could in fact be a win/win for nature, and the recreational usage of the Scrubs as a whole.
16	247	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P12		2.1 We note that Wormwood Scrubs Street has now been named when it was not in the equivalent illustration in the last Plan. We also note that it appears to be outside the boundary of the Scrubs (as it was in the last Plan). We mention this because in Figure 4.45 p 114 (POLICY P12: Wormwood Scrubs) Wormwood Scrubs Street is marked within the boundary, indeed it appears to occupy the northern strip of LNR (see Figure 6.3 p 140). There was a similar marking under POLICY P12: Wormwood Scrubs in the last Plan. We can only assume this is a printing error: otherwise it would flout innumerable planning policies (not least within this Plan), the Act, would not be justified and would be inconsistent with national policy.
16	252	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P12		3.1 We note some tinkering with the text of this Policy in response to comments from ourselves and others, in particular the reinstatement of the reference in WS.4 to the character of the Scrubs as more wild than tamed, although not in the prominent place we (and the Charitable Trust) had suggested in the VISION at the beginning.
16	253	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P12		3.2 Connections g) Improving access to Wormwood Scrubs... i) access points shown in figure 4.45 now defined by reference to figure 4.45. Our comments under 2.3 to 2.8 above apply to access points from and at the side of the Station. For the rest, our comments on the last Plan still apply.
16	254	Community Group	Stephen	Waley-Cohen	The Friends of Wormwood Scrubs		P12		3.3 The changes in WS4 and WS6 reflect some of our points to a minor degree but we maintain our comments on the whole of this POLICY in the last Plan and reaffirm our suggested amendment (our comments on the last Plan at 5.6).
33	804	National Body	Mark	Furnish	Sport England		P12		In relation to Wormwood Scrubs, Policy 12 still does not recognise its important sport function or that it is even a playing field, Sport England would welcome the inclusion of this within Policy 12's vision. Sport England considers that Policy 12 should clearly state that Wormwood Scrubs should be protected as a playing field as there is no strategic documents that's highlights there is a surplus of playing field land in the area and its loss as a sporting location would have significant adverse implications for sport and activity in the area. In this respect, paragraph 3 highlights the site designations and statutory protections but does not include its statutory protection as a playing field. It is noted that paragraph 4 highlights that the Act states that Wormwood Scrubs should be available for exercise and recreation but this is not the same as protecting its use for formal sport (for instance, removal of playing pitches from the site would still result in it being available for exercise and recreation).
33	805	National Body	Mark	Furnish	Sport England		P12		Sport England, do, however, welcome that paragraph 5 does state that the existing sports pitches should be retained or if lost replacements should be of an equal or higher quality and function (in line with Policy TCC6) but Sport England advises that the reference to 'sports pitches' is amended to 'playing field' as the NPPF, paragraph 97, specifically refers to the protection of playing fields which are more than just the playing pitches.
119	822	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		The Wormwood Scrubs Charitable Trust (WSCT) has management responsibility for the Scrubs. The Council (LBHF) is sole corporate trustee. The WSCT Committee, three councillors and two non-voting co-opted members, has responsibility for managing the Trust ensuring it achieves its charitable objectives. At present the two non-voting co-opted members are also members of the Friends of Wormwood Scrubs. At the most recent committee meeting on 19th June 2018 it was agreed the Trust would respond to the invitation to comment on the OPDC Local Plan. The comments attached to this letter are in addition to any comments made by the council and the Friends and concentrate on the Scrubs and its immediate surroundings.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
119	823	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		The Trust is encouraged to see the Chairman's continued support for a 'protected Wormwood Scrubs' recognising the 'valuable ecological spaces' and a key aim of the plan to protect and improve Wormwood Scrubs. However, there seems to be little recognition within the plan that the Scrubs has a range of different habitats and land uses. Although this is picked up in the Heritage Strategy much more work needs to be done to understand and value these habitats so that they can be adequately protected.
119	824	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		A particular concern, regarding protection, is the number and location of new access points proposed by the plan. Access points in sensitive areas could damage the biodiversity value of the scrubs and, until we understand the real value of what we have, we should not propose to change it. Until a management plan for the scrubs is in place any access point to the scrubs must be described by the plan as indicative at this stage. This concern is echoed by the resident led LBHF Biodiversity Commission whose 2017 report recommended; the biodiversity value of the scrubs needs to be fully understood, that access should not be allowed near the existing Local Nature Reserves and that the railway embankment, a major site for biodiversity, should be retained.
119	825	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		Happily, we plan to commission a piece of work to understand the value of the Scrubs habitats and land uses which should help. The Trust and the Council are working with HS2 on a £3.9 Million project to improve the ecological spaces of the Scrubs, including a long-term management plan to maximise biodiversity opportunity by considering all aspects of the use of the Scrubs. This plan should be referenced in the Local plan and be in place before any proposals to improve or change the scrubs are made.
119	826	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		The Trust is encouraged to see the Chairman's continued support (foreword) for a 'protected Wormwood Scrubs' recognising the 'valuable ecological spaces' and a key aim of the plan (1.13 d) as protecting and improving Wormwood Scrubs. However much of the plan treats the Scrubs as a single entity rather than a range of different habitats and land uses. More work needs to be done to understand and value them so that they can be adequately protected.
119	827	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		A Particular concern of the Trust is the number and location of proposed new access points onto the Scrubs shown in the Local Plan. Access points in sensitive areas could damage the biodiversity value of the scrubs. The Resident led LBHF Biodiversity Commission's 2017 report also suggested the OPDC consider the biodiversity value of the scrubs in more detail, in particular not allowing access near the Local Nature Reserve areas and retaining the railway embankment, a major site for biodiversity. They noted that: Access from the redevelopment site will need careful management to maintain the habitat variety and biodiversity. The Biodiversity Commission report can be found in full at: https://www.lbhf.gov.uk/sites/default/files/section_attachments/biodiversity_commission_final_report_rev4.pdf
119	828	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		The Trust and the Council are working with HS2 on a £3.9 Million project to improve the ecological spaces of the Scrubs, including a long-term management plan to maximise biodiversity opportunity and a Conservation Management Plan (CMP) that considers not just the ecological spaces but also other valuable aspects of the Scrubs such as sport and recreation. These plans should be agreed and in place before any new access points are confirmed.
119	829	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		Include reference to the following in Policy P12 and other suitable points of the plan The CMP and Long-term management plan produced by the HS2 project will provide the detailed biodiversity proposals for the Scrubs. The CMP and Long-term management plan will perform the role of the Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP) in Policy SP8. The Local Plan should recognise that proposals for the Scrubs including all proposed access points, are indicative until the GIOSSMP is in place. For consistency we will refer to the Scrubs CMP and Long-term Management plan as the GIOSSMP
119	833	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		These different spaces and habitats need to be more clearly reflected on the Plans illustrations esp. Fig 4.45
119	836	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12	Fig. 4.45	Fig 4.45 does not have the clarity of the other place diagrams. It shows the existing situation of desire lines, land use patterns and management practice rather than proposals which will dictate the conservation, enhancement and protection of the scrubs. Because the scrubs GIOSSMP has not been completed the zones should be based on what policy plans we do have; the existing SINC and Local nature reserves. Some of the labelling of Fig 4.45 is also inaccurate e.g.: • Wormwood scrubs street • Railside habitat • Car park • Hammersmith Hospital
119	837	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12	Fig. 4.45	Fig 4.45 should show: • the full extent of the SINC and LNR's as areas of biodiversity opportunity and protection rather than being labelled as Railside habitat or 'wormwood scrubs street' • remaining areas need not distinguish between sports pitch and Key public access. These are areas of sport and recreational opportunity. • Wormwood scrubs street (see separate point below) should be shown but marked clearly outside the P12 place boundary • Routes across the scrubs including existing desire lines and access points should not be shown at this stage. • The position of the Combined cycle/pedestrian key routes proposed by P8 and P10 should be as clear as possible. Are they to be within or outside the P12 place boundary? • A key Route should also be shown on the South side of the scrubs in line with Fig 7.5 & 7.7. This route, Wormwood Scrubs street and the key cycle/pedestrian routes above should be shown as Green routes that maximise green infrastructure.
119	838	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		The Vision and policy statements currently indicate how the scrubs might change through connections with other places and enhancements 'done to it'. The HS2 project requires the GIOSSMP to be agreed. This will set out the Vision and goals for the Scrubs sport, recreation and biodiversity opportunities and detailed objectives for the Scrubs biodiversity including how its inherent values might be conserved, enhanced and engaged with. This GIOSSMP should be mentioned in the Delivery and Green infrastructure policies. Vision should reflect that the scrubs will be enhanced and managed in accordance with a GIOSSMP Policy Delivery should reflect that development proposals and additional resources will support the agreed GIOSSMP

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
119	839	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		There is no policy for Land use. Although the whole of the Scrubs is MOL different aspects of use will benefit from different levels of access. Land Use Policy should be added. Land use and access will reflect the sensitivity of habitat and the needs identified in the GIOSSMP and other LBHF strategy documents
119	840	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		Vision should reflect that the scrubs will be enhanced and managed in accordance with a GIOSSMP Policy Delivery should reflect that development proposals and additional resources will support the agreed GIOSSMP Green Infrastructure and Open Space. c) The primary agent of protection and enhancement will be the GIOSSMP not 'sensitive enhancements' (although these might help once the value of the habitats are understood)
119	841	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		f) SUDS is just one way the scrubs can contribute to Climate change resilience. Its strategic value should be in dealing with on-site flooding issues not receiving run off from other sites
119	842	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		Point (g) of Policy P12 on Connections should be called public realm and movement to be consistent with other Places. It should consider routes and access according to character typology as much or more than the needs of surrounding development to access the scrubs. Public Realm and Movement • Rename Connections Policy • Key routes identified to the boundaries of the scrubs in accordance with Fig 7.5 & 7.7 will provide connectivity to local neighbourhoods. • Access across or into the scrubs will be only pedestrian and determined by site sensitivity and use rather than neighbourhood connectivity in line with the GIOSSMP.
119	843	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		There is no policy for Heritage and Character. This is crucial for understanding the value of the different habitats and uses for the Scrubs. Heritage and Character Policy to be added (see comments on heritage)
119	844	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12	WS5	The survey from 2016 is viewed with some suspicion by the Friends of Wormwood Scrubs and that the implication is a weakening of the theme of 'more wild than tamed'. WS5 should have less detail of the 2016 survey as the Scrubs GIOSSMP will update and replace this
119	845	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		The Scrubs GIOSSMP will provide an opportunity to fully understand the heritage of the Scrubs and set out a masterplan and management plan to address issues for Biodiversity, Sports and Recreation. The GIOSSMP will go on to develop objectives for biodiversity. Objectives for sports and Recreation can only be developed if and when funding is identified. Proposed Change: Add new WS 6 The HS2 funding for biodiversity improvement will provide an opportunity to understand the heritage of the Scrubs through the use of surveys and consultation to produce a GIOSSMP for the scrubs including objectives for improving biodiversity. Objectives for sports and Recreation will be identified and considered as part of the GIOSSMP and developed when funding is identified.
119	846	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		P12 and other parts of the Plan abound with references to sensitive connections, enhancements and routes but provides little reassurance how such sensitivity will be achieved. Reference should be made to the mechanism for agreeing these changes- The GIOSSMP. Proposed Changes: WS 6 rename WS7 Omit from New and enhanced access. Add: Key routes are proposed as shown on Fig 7.5 & 7.7. Access across or into the scrubs will be considered as part of the GIOSSMP WS 7 rename WS8
119	850	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		Access to the Scrubs requires careful management in order to prevent declines in biodiversity. This will be considered as part of the GIOSSMP.
119	852	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		GIOSSMP added to the Evidence base links when complete.
119	869	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		P12		That Fig 4.45 should be more cognoscente of Fig 6.3 and Policy SP8
35.b	1041	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	P12		We support the aims of the policy to improve access to Wormwood Scrubs for all Londoners.
56	1157	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P12		LBHF supports the retention of Wormwood Scrubs as Metropolitan Open Land and its role as a Metropolitan Park.
56	1158	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P12		There is limited reference to Linford Christie Stadium in the Local Plan and supporting documents. It is a major recreation and sporting opportunity and the grass pitches currently managed by Linford Christie Stadium are within the OPDC boundary. LBHF Local Plan seeks improvements to existing open space such as the Linford Christie Stadium. As OPDC borders the Linford Christie Stadium, we would welcome reference to the sporting, leisure and recreation potential of Linford Christie Stadium which also makes reference to the relationship between Linford Christie Stadium and activities on the Scrubs. In the supporting text to Policy P12 & EU1, add reference to the sporting, leisure and recreation potential of Linford Christie Stadium which borders the OPDC boundary and also acknowledge the relationship between Linford Christie Stadium and activities on the Scrubs.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1159	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		P12		<p>The Council and the Trust are working with HS2 on a £3.9 million project to improve the ecological spaces of the Scrubs, including a long term management plan to maximise biodiversity opportunity. An essential piece of the project will be to produce a Conservation Management Plan that considers not just the ecological spaces, but also other valuable aspects of the Scrubs such as sport and recreation. Access to the Scrubs will be considered as part of the Conservation Management Plan.</p> <p>Policy P12 and SP7 should include reference to the Conservation Management Plan which LBHF and the Trust will be producing with funding from HS2.</p>
110.b	1497	Community Group	Robin	Brown	Grand Union Alliance		P12		<p>Ultimately 4 access points onto Wormwood Scrubs from Old Oak South/Old Oak Common Station, not including any further entry points from Wormwood Scrubs Street will adversely impact the natural, amenity and tranquil character of wormwood scrubs. The OPDC should defer to the informed views of the Friends of wormwood Scrubs/ Wormwood scrubs Charitable Trust on the number and locations of any access points.</p>

Chapter 5. Design

Policy D1: Securing high quality design

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
17.b	270	Strategic Partner	Debbie	Fifer	Canal & River Trust		D1		We previously recommended that it would be beneficial for the policy to encourage developers to engage in pre-application discussions with statutory consultees. The amended policy now includes reference to engagement with relevant statutory consultees as early as possible in the design process which is welcomed.
17.b	271	Strategic Partner	Debbie	Fifer	Canal & River Trust		D1	Para 5.7	<p>Paragraph 5.7 of the original plan has been deleted to avoid restricting procurement. This paragraph stated that, in respect of major applications, "design brief development should be informed by best practice guidance (such as that provided by the Royal Institute of British Architects (RIBA)) to ensure a design team is appointed with a range of appropriate skills and experience that also supports innovation and emerging practices. This should include skills and experience in public realm and landscape design and delivery."</p> <p>The wording of paragraph 5.7 does not appear to be unduly prescriptive and it is disappointing that a requirement for major developments to be informed by best practice guidance has been deleted. The Trust is particularly concerned at the deletion of reference to including skills and experience in public realm and landscape design and delivery which can be key to effective place making and of importance in the consideration development adjacent to waterways.</p> <p>We would wish to see paragraph 5.7 (or similar) reinstated within the plan.</p>
47	587	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D1		D1: Securing High Quality Design. The principles of Design Scrutiny and Maintaining Design Quality (Draft London Plan D2) have not been included in Chapter 5. If it is the intention that the OPDC Place Review panel will include a design review, then this should be included in the parameters of the group
110.b	1498	Community Group	Robin	Brown	Grand Union Alliance		D1		D1 a) ii, para 5.6: the Community Design Review Group is welcomed in principle, but greater assurance is needed that the representations made by community groups are not seen as lesser to those from the Group. Transparent governance and process is required. Typo: "Place missing from Community Place Review Group" in the policy.
110.b	1499	Community Group	Robin	Brown	Grand Union Alliance		D1		D1 a) iii: The Supreme Court in 2014 confirmed the 'Sedley' or 'Gunning' principles that consultation must in order to be considered fair: take place when the proposal is still at a formative stage etc. Therefore, this changed part of the policy is incomplete by not including non-statutory stakeholders such as local communities. 'Plain English' should be adopted for information dissemination and to guide discussions.

Policy D2: Public realm

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	203	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	D2		The revised policy embeds the Mayor's Public London Charter into the Local Plan and requires, where feasible, new developments to provide publicly accessible private realm which is available for unrestricted continuous public use and access, 24 hours a day, 7 days a week, free of charge. The Charter has not undergone public consultation and so we do not consider that it has any weight as a planning document. Whilst we agree with the aspirations and broad intent of the policy, we consider that it is important to recognise that these requirements may not always be feasible or desirable, depending on the nature of the space. There are various circumstances in which temporary closure will be required or desirable, including for temporary events, maintenance or in cases of Force Majeure, and so we would encourage some practical flexibility within the clear overall ambition
28	748	Strategic Partner	Lucinda	Turner	Transport for London		D2	Policy part a and 5.11	TfL welcomes the additional references to the delivery of Healthy Streets alongside high quality urban realm design. This will be critical in delivering good growth
33	806	National Body	Mark	Furnish	Sport England		D2		<p>Sport England welcomes that Policy D2: Public Realm, and supporting text paragraph 5.11, now states that proposals would be required to contribute to the delivery of Healthy Streets, but would refer to its comments in relation to Active Design in the Strategic Policies comments above:</p> <p>Many of the Strategic Policies or supporting text reference active and healthy lifestyles, contributing towards a healthy place and delivering Healthy Streets (paragraph 3.17), active destinations (Policy SP6), active travel (Policy SP7) and discuss interconnecting places (Policy SP7). Furthermore, as noted above, improving health and wellbeing is identified as an opportunity for the area. These aspects are welcomed by Sport England but, with the exception of Healthy Streets, no steer is given to stakeholders on how to potentially achieve a healthy place. The Mayor's Healthy Streets is a good tool but Sport England considers that creating active places and encouraging communities to become active goes beyond Healthy Streets. The Draft Local Plan does touch upon some aspects to consider in paragraph 3.17 but links to Active Design, as highlighted in Sport England's previous submission, would really be of benefit to not only developers but also OPDC planners, as it highlights the principles to consider when designing in actively and creating healthy places. It also highlights case studies that could be used to inspire development within Old Oak and Park Royal. Healthy Streets is one such example but, as can be seen from the guidance, there are other aspects that can be implemented in order to create active places. As previously set out, Sport England would happily work alongside OPDC to draw out the Active Design principles within the Local Plan and create links between the guidance and documents. Further details on Active Design can be found at https://www.sportengland.org/facilities-planning/active-design/</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1161	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D2		See comments on Policy EU2. Add new point to criteria a) as follows:- a) Proposals will be required to contribute positively to the delivery of Healthy Streets and a high quality, inclusive, accessible and coordinated multi-functional public realm by: vii) Consider the location of the public realm with regard to the main sources of poor air quality e.g busy roads, combustion based energy plant and provide mitigation for the impact of poor air quality
110.b	1500	Community Group	Robin	Brown	Grand Union Alliance		D2		D2 a), a) vi, viii: Existing severance and permeability issues will be amplified by the imposition of the OPDC's assumed building typology (tall/multi-level, high density, mixed use, coarse grain, deep floorplates) and the servicing requirements of intensive mixed uses on land which is already affected by the OPDC site's multi-level topography, vast amount of transport infrastructure, and vast amounts of safeguarded land with postponed or uncertain future development. Quanta/targets of development are undermining the delivery of liveable places. Current and planned developments and their public realms at North Acton provide a clear depiction of the disappointing results. Consequently the policy is inadequate to ensure that development proposals contribute positively to 'Healthy Streets' etc., support infrastructure and adhere to a clear, coordinated and robust public realm and open space management and maintenance strategy. The policy should be strengthened and should require proposals to seek to enhance level connectivity between places both within and beyond the development or development phase.

Policy D3: Accessible and inclusive design

No Comments

Policy D4: Well-designed buildings

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
204	21	Local Resident	Anita	Ringsell			D4		Future plans for London should consider the need for low-rise buildings not high-rise. We do not any more Grenfell incidents!
56	1162	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D4	i	(a) too much use of the word "positive" in bullet point (i). Suggested wording to (a) i) as follows:- ".....or positively contribute to the delivery of character and placemaking."
56	1163	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D4		(b) Plant is not only located on roofs but can be anywhere in buildings on each floor where it could have a harmful visual impact. Urban greening, e.g. green walls, planting on terraces and balconies, and renewable energy regeneration equipment can also be in locations other than the roofs. Suggested wording as follows:- "b) Proposals will be supported where roofs buildings and in particular roofscapes are:"
56	1164	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D4	Para 5.36	Add new text to Para 5.36:- "Any external installations such as awning boxes, louvres and signage should be designed to integrate well with the design of the shopfronts."
56	1165	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D4		The policy includes reference for the need for non-residential buildings to achieve the BREEAM "Excellent" rating. This is welcomed, but it is not clear how the sustainability of residential buildings will be assessed. Consider specifying a requirement for the residential developments alongside the requirement set out for the non-residential buildings Also, does this requirement apply to all buildings or just major developments? Clarify if the BREEAM requirement is for major developments only
56	1166	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D4	Para 5.38	Para 5.38 states that residential development will be expected to accord with the relevant latest London and national guidance. This could be confusing as national and London guidance is often different in the area of sustainable design and construction requirements for new buildings. Suggest removing the reference to national guidance as it is likely that London guidance will be more appropriate in terms of promoting high levels of sustainability in new developments.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1167	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D4		<p>The form and layout of the buildings should help prevent or mitigate the impacts of poor air quality for Residential, Educational, and Health and Social Care facilities by:</p> <ul style="list-style-type: none"> • Ensuring for C2, C3, C4 use the habitable rooms (Bedrooms, Living Rooms) and external amenity area's including balconies are orientated away from the main sources of poor air quality e.g busy roads, combustion based energy plant • For D1 (crèches, day nurseries, day centres, Schools) uses the classrooms and entrances to the buildings are orientated away from the main sources of poor air quality e.g busy roads, combustion based energy plant <p>For D1 (Clinics, health centres, care homes) buildings are orientated away from the main sources of poor air quality e.g busy roads</p> <p>Suggested changes to text:</p> <p>vii) Consider the location of the building and uses with regard to the main sources of poor air quality e.g busy roads, combustion based energy plant and provide mitigation for the impact of poor air quality</p>
110.b	1439	Community Group	Robin	Brown	Grand Union Alliance		D4		<p>These targets, therefore, lead to outcomes which are not in accordance with the policy ambitions of the London Plan, nor the proposed outcomes of this Local Plan, leaving the developments agreed to date short of effective, useable and appropriate play space, public space and air quality remediation. Mitre Yard is the strongest example to date, where closed windows and artificial ventilation are set as planning policy obligations to mitigate against pollution – but with play spaces on the roof this development falls far short of the Mayor's stated policies for both air quality and child play. We made this point in our Regulation 19 response, but now the changes made to the Plan provide substantial room for uncertainty of interpretation.</p>
110.b	1501	Community Group	Robin	Brown	Grand Union Alliance		D4		<p>D4 b) i: Roof terraces/balconies provide almost all the private outdoor amenity and communal open space in tall buildings, which have additional servicing needs and limited roof space and ground space in relation to internal floor area. If roof spaces are able and wanted to be used for public or private amenity space then the design should also demonstrate user amenity, comfort and security while remaining compliant with the other parts of Policy D4 b).</p>

Policy D5: Tall buildings

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
204	17	Local Resident	Anita	Ringsell			D5		<p>I live in Wesley Avenue [--] and work in Hammersmith. I am also a member of the Wesley Residents Association. I have been to several meetings in the Collective with GUA representatives discussing the OPDC future plans for Park Royal and the surrounding areas. There seems to be a big need to build high rise buildings now such as North Acton. This does not make for good living and is not in keeping with the area. No thought has been put into the infrastructure so support this future great influx of communities, such as roads, schools, healthcare, shops, green spaces. What is proposed is too dense and too much for a relatively small area. The residents here were never consulted by Ealing Council (as per usual) about the large towers built at North Acton for the student population. It has made the area an ugly sight. The OPDC should think about the communities that are living here now and how to keep community spirit going. Stonebridge Estate many years ago was high tower blocks which were eventually demolished to make low-rise buildings and the people are a lot happier and I believe crime has reduced.</p>
23	134	Local Authority	Muhammed	Butt	London Borough of Brent		D5		<p>The Local Plan proposes a definition for tall buildings of 48 metres or 15 storeys above ground level. The Tall Building Statement which supports the Local Plan refers to:</p> <ul style="list-style-type: none"> - 6 London precedents, with an average height of 8.75 storeys - 5 OPDC permitted schemes, with an average height of 7.8 storeys - 4 supporting studies (Old Oak North Development Framework Principles, Park Royal Development Framework Principles, Scrubs Lane Development Framework Principles and Victoria Road and Old Oak Lane Development Framework Principles), with an average recommendation of 8.75 storeys. <p>On this basis the London Plan definition of 10 storeys is considered a suitable definition for the OPDC area. The proposed 15 stories is not based on evidence or justified.</p> <p>Large areas of the OPDC area are already identified as suitable for tall buildings. The remaining areas that are not suitable for tall buildings are mainly adjacent to existing areas of low-rise development (2- 3 storey) that are envisaged to remain. Buildings over 30m would not be appropriate in this context and would severely damage the character of these areas. Furthermore, the lack of specific heights within the Places policies is of concern, both for tall buildings and all other development. The standard description of 'a range of heights' or 'tall buildings' does not give sufficient indication which heights are deemed acceptable for these specific sites. It raises concerns of over-development that would not respect local character or ensure good placemaking.</p>
115	295	Local Resident	Nye	Jones			D5		<p>Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.</p>
210	305	Local Resident	Gail	Dobinson			D5		<p>TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.</p>
212	317	Local Resident	Natasha	Salkey			D5		<p>Policy D5 discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.</p>
213	323	Local Resident	Rachel	Ritfeld			D5		<p>TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.</p>
213	336	Local Resident	Rachel	Ritfeld			D5		<p>TITRA is dismayed that Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a tall building is. It seems wrong that a document produced for a public consultation can be so unclear and disingenuous. This policy D5 is likewise inadequate and unsound.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
214	347	Local Resident	Ciara	Solmi			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
32	385	Local Resident	Bernie	Timmins			D5		I object to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
92.b	430	Community Group	Melanie	Whitlock	The Hammersmith Society		D5		10 Tall Buildings. The density levels above, required by the 24,000 homes target, will require very tall buildings. The draft plan is unclear on height despite the fact that calculating density on the basis of available land should make it easy to give indicative heights. There are references to tall buildings of 15 storeys or over, whereas it is clear from the experience of North Acton, where 32 plus storeys are in the pipeline, that this sort of height will be sought for the OPDC area. We suspect that the lack of clarity is based on fear of a negative reaction from the public. 11 The Tall Buildings statement simply list 9 locations where tall buildings would be suitable. These are large areas, hardly "locations" - eg all of Old Oak North. The lack of specificity on heights and the broad brush approach to siting them is not "positively planned" and is not justified.
219	444	Local Resident	Jane	Dreaper			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document. THIS IS VERY CONCERNING - NORTH ACTON HAS BEEN QUOTED TO US AS AN XAMPLE OF SUCCESSFUL REGENERATION BUT IT IS AN UGLY MESS. AGAIN, WHERE IS YOUR TRANSPARENCY?
220	453	Local Resident	M.	Szoke			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
221	462	Local Resident	James	Trew			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
221	475	Local Resident	James	Trew			D5		TITRA is dismayed that Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a tall building is. It seems wrong that a document produced for a public consultation can be so unclear and disingenuous. This policy D5 is likewise inadequate and unsound.
223	548	Local Resident	Eileen	Hannington			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
223	561	Local Resident	Eileen	Hannington			D5		TITRA is dismayed that Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a tall building is. It seems wrong that a document produced for a public consultation can be so unclear and disingenuous. This policy D5 is likewise inadequate and unsound.
47	586	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D5		In general, the policies in this Chapter, SP9 paras 4.35 and 4.36 and Places have been redrafted to align with the Draft London Plan as regards Tall Buildings. As the London Plan is at draft stage it is questioned whether the amendments particularly to the tall buildings section D5 are therefore justified at this stage.
47	588	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D5		D5: Tall Buildings. The draft London Plan Policy D8 para 3.8.2 advises that the definition of a tall building in the OPDC should relate to the evolving context. It is not clear how the definition for a tall building as set out in the OPDC Revised Local Plan para 5.39 and elsewhere (SP9 4.35 and 4.36) is justified. The context with neighbouring boroughs such as Kensington Chelsea is not 15 storeys or 48 metres. Figure 3.15 identifies areas and specific locations where tall buildings are an appropriate form of development "in principle". Given the proximity of these areas and locations to the RBKC boundary there will be an impact on the setting of a number of RBKC heritage assets including Kensal Green Cemetery, Kensal House and St Charles Hospital.
47	589	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D5	3.15	In the interest of duty to co-operate the text in Figure 3.15 should be amended to: · "Areas where tall buildings might be an appropriate form of development". · Delete "Specific locations where tall buildings where tall buildings are an appropriate form of development in principle"
47	590	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D5	5.41	The justification for tall buildings para 5.41 should also deliver positive benefits to the wider community which should include neighbouring boroughs especially where there is a degree of harm to views and setting of heritage assets.
225	633	Local Resident	Marta	Donaghey			D5		I object to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
9.b	645	Statutory Consultee	Katie	Parsons	Historic England		D5		There is concern that the amendments made to this policy involve the removal of several key aspects of wording which relate to both place-making and the parameters of stakeholder engagement. We would encourage the reinstatement of the wording at point c (previously point g), to ensure that it is clear to readers, applicants, developers, and decision makers the sort of detail expected to be discussed as part of any proactive engagement process. Issues such as location, scale, height, massing and design are integral and the Plan would be stronger for outlining the expectation that this will be discussed with Historic England who will be statutory consultees as part of a subsequent planning application.
9.b	646	Statutory Consultee	Katie	Parsons	Historic England		D5		The OPDC's approach is that that tall buildings need to be of exceptional design quality; additionally harm has been identified in sensitive locations as a result of tall buildings both in the evidence base and by Historic England in our representations. The NPPF advocates that harm should be avoided in the first instance, ideally then the locations for tall buildings should be relocated away from these sensitive locations rather than crystallising them further into the Plan on the basis that the harm can be mitigated via design. We note that this would also be in line with the new draft London Plan Policy on Tall Buildings (policy D8 part D) which requires alternative forms of development to be explored as part of a clear and convincing justification for any harm to heritage caused by proposed tall buildings.
227	682	Local Resident	Jamie	Sutcliffe			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
107	880	Residents Association	Mark	Walker	TITRA		D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguously in the documentation what a tall building is; this is an uncalled-for tactic in a public consultation document.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
107	895	Residents Association	Mark	Walker	TITRA		D5		TITRA is dismayed that Policy D5 which discusses tall buildings - without once clarifying in the documentation what a tall building actually is. It seems wrong that a document produced for a public consultation can be so unclear and disingenuous. This policy D5 is likewise inadequate and unsound.
228	909	Local Resident	Pablo	Navarrete			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
114	920	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		D5		2.3. We object to plan Policy D5 which discusses tall buildings - without once clarifying documentation what a tall building is and what is more talking about it being irrelevant or unimportant at this stage. An uncalled for tactic in a public consultation document and very disturbing to local residential communities.
114	934	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		D5		The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: • A tall buildings policy which is unclear, opaque and non-transparent to the public as well as contrary to the London Plan.
95	990	Local Resident	Mark	Walker			D5		I also object to plan Policy D5 on tall buildings because you never clarify what a tall building is anywhere. How can this be a valid public consultation on a central part of this plan when you have clearly done your calculation but you are still hiding the evidence from public view?
101	1099	Local Resident	Jason	Salkely			D5		I object to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
56	1168	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D5		The emissions from combustion based energy plant particularly the location and termination height of the flue have an impact in respect to the exposure of sensitive receptors such as Residential, Educational, and Health and Social Care facilities. The location and height of the flue for the combustion based energy plant should be considered in respect to residential units in buildings on-site and off-site of the development above the termination height of the flue. The termination of the shared energy plant flue of all the combustion based energy plant should be a minimum of 3 m above roof level of the tallest building in the development to enable efficient dispersion of NOx emissions and meet approval under the Clean Air Act 1993, Section 14, 15 and 16. Add new bullet point (e) as follows:- Proposals for tall buildings will be supported as an appropriate form of development in principle where they: e) Do not result in the WHO Air Quality Guideline values being exceeded from ground level to roof level for any on-site and off-site sensitive receptors
56	1169	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D5	c.	(c) why mention this here? All major and sensitive developments will require the same. Generally, the policy should list the main issues of tall buildings which are that proposals should demonstrate • A positive relationship to the surrounding townscape and public realm, including an animated and active base • Highest quality of architectural design and materials • An acceptable impact on the skyline from important viewing points • Full regard to the significance of heritage assets • Support by appropriate transport infrastructure • Sustainable design and construction • That it does not have a detrimental impact on the local environment in terms of micro climate, wind, overshadowing, light spillage and vehicle movements/servicing • That it respects the principles of accessible and inclusive design.
234	1298	Local Resident	Elaine	Gristock			D5		Policy D5: what exactly are 'tall buildings'?; you really should acknowledge that everything is relative to its surrounding area. To residents in the railway cottages, something of five storeys would be tall; the monsters being erected at Oaklands will leave us feeling sick and overwhelmed.
103	1336	Local Resident	David	Turner			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
89	1346	Local Resident	Nicky	Guymer			D5		TITRA objects to plan Policy D5 which discusses tall buildings - without once clarifying unambiguous in the documentation what a "tall building" is, an uncalled-for and unfair tactic in a public consultation document.
82	1376	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		D5		2.6 The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: A tall buildings policy which is unclear, opaque and non-transparent to the public as well as contrary to the London Plan.
110.b	1502	Community Group	Robin	Brown	Grand Union Alliance		D5		Policy's opening: "An appropriate form of development in principle" is at variance to the current Mayor's vision for London as expressed in his A City for All Londoners 2016 in which he stated that high density does not mean high buildings. To achieve an average density of 460 upha - a higher density than the current London Plan's Table 3.2 SRQ Density Matrix - across Old Oak North, tall buildings are necessary. Necessary to fulfil the GLA development targets which predate the current Mayor's election. (Source: Design & Environment Presentation event 21 June 2018).

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
110.b	1503	Community Group	Robin	Brown	Grand Union Alliance		D5		The proposition that tall buildings are an appropriate form of development in principle is contested. It can be argued that tall buildings always deliver on legibility or create destinations because they are more prominent due to their height and design. Taller buildings can also decrease the visibility, legibility and amenity of surrounding neighbourhood features. Tall buildings are not always the most effective or efficient way to accommodate higher densities or mixed uses on a given plot, and come with additional liveability, construction, servicing and operational costs. These are dis-benefits which are not stated in para 5.41 as they should in order to be even handed. Policy D5 and Para 5.41: make no reference to the specific findings and recommendations made by OPDC's Supporting Studies pertaining to tall buildings. Policy should require proposals for tall buildings to explicitly demonstrate why their building programme could not be accommodated within a lower rise development form and should not be advanced as appropriate in principle. Policy and text should require the minimising of dis-amenity for the surrounding area and communities
120	1630	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		D5		HNF is concerned that a number of the previous moderating policies in regard to tall buildings have been removed to the sections of the London Plan. As much of the Willesden Junction Station area is likely to be developed as tall buildings it will be necessary for the emerging Old Oak North SPD to address these specific issues.

Policy D6: Amenity

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
17.b	272	Strategic Partner	Debbie	Fifer	Canal & River Trust		D6	Table 5.1	We previously provided comments in respect of table 5.1 (which sets out benchmarks for amenity that the OPDC will require new development to comply with under policy D6) suggesting that a standard of 2 hours of sunlight on 21 March over half the area is not a particularly high aspiration for such a significant asset to the area as the Grand Union Canal and questioned whether this meets the requirement in NPPF paragraph 64 for development to take opportunities to improve the character and quality of the area. We note that the reference in table Table 5.1 to 2 hours outdoor sunlight on public realm (BRE) remains unaltered although a new paragraph has been inserted requiring "submitting a Daylight, Sunlight and Microclimate Assessment where the scale of proposed buildings proposed has the potential to affect the amenity of light to sensitive neighbouring uses". The Trust maintains its original comment in respect of Table 5.1 and would also ask that recognition is given to the canal as a sensitive neighbouring use the impact on which requires assessment.
47	591	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D6	5.45	Amenity. Para 5.45 amended paragraph first line should reinsert "will work with stakeholders to minimise negative impacts." As this reinforces a plan which is positively prepared.
47	592	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D6	C)	Criteria (c) of Policy D6 introduces the "agents of change principle" to new development, to ensure that the operation of existing commercial uses is not jeopardised by new development. This is welcomed.
33	807	National Body	Mark	Furnish	Sport England		D6		Amenity includes the agent of change principle but Sport England considers that this should not just be based on the function of employment uses and/town centre uses. Sports facilities can be similarly affected due to noise they generate or other risk factors such as ball strike. Sport England advises that this principle is extended to include sports and recreation facilities in the policy or in the supporting text, for example paragraphs 5.45 or 5.48.
56	1171	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D6	Para 5.47	"...should seek to achieve...." is too weak , in particular when this can be outbalanced by unspecified "substantial "benefits for the wider area" which there always will be. Consider strengthening the wording in para 5.47 as follows:- " Proposals should seek to achieve are expected to comply with the benchmarks in Table 5.1. Where this cannot be fully achieved, appropriate mitigation measures must be integrated into the proposed development. However, OPDC recognises that there may be instances where a degree of flexibility will be required where development will deliver other substantial benefits for the wider area". (delete italic text)
56	1172	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D6		Please see council response for EU4 (i). Amend point (g) iii) as follows:- "Proposals will be required to deliver an appropriate standard of amenity by: g) ensuring proposals that include residential private and / or communal open space: iii) are located and/or orientated away from and/or designed to mitigate air, light and noise pollution."
56	1173	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D6	Para 5.50	Please see council response for EU4 (i). Amend Para 5.50 as follows:- "To support their usage, where possible, they should be positioned located and/or orientated away from, or designed to mitigate, sources of noise and poor air quality...."

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1174	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D6	Para 5.51	Please see council response for EU4 (i) Amend Para 5.51 as follows:- "Enclosing balconies as glazed, ventilated winter gardens should be explored at higher storeys, in locations exposed to poor air quality, Noise Exposure Category C or D or areas of high wind...."
56	1175	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D6	Para 5.53	See council response to EU2. Amend Para 5.53 as follows:- "Green infrastructure can also be an effective way to screen and protect sites against poor air quality, turbulence, wind tunnelling and noise caused by high density development".
110.b	1505	Community Group	Robin	Brown	Grand Union Alliance		D6		D6 a): There is an inadequate expression of the relevant key Supporting Study findings and recommendations within this and other policies and text. There is an explicit recommendation for performance modelling at the design stage, because it is so difficult to simultaneously optimise for energy, overheating, daylight & zero carbon emissions (at a later stage). Lower cost, high volume and rapid construction seem to be higher priorities for OPDC than painstaking advanced occupant comfort modelling and bespoke design detailing.
110.b	1506	Community Group	Robin	Brown	Grand Union Alliance		D6		The Old Oak Development Framework Principles with its massing recommendations creates two different façade conditions, which require a nuanced approach to amenity tests: 1) over-exposed upper storeys of towers at risk of over-heating or pollution, noise & vibration disturbance from road/rail corridors and wind tunnels; and 2) overshadowed or partially shaded shoulder/podium blocks, North or North-East aspect windows, and central areas of deeper-floorplate mixed use buildings. OPDC might simply allow the reduction of glazing to comply. But it would be better for occupants if the Plan specifies minimum and recommended glazing ratios (depending on floor area, occupancy level, and room aspect and orientation), supplemented by additional high reflectivity/VLT glass, solar shading and wind shielding (e.g. movable screens or overhangs) where necessary
110.b	1507	Community Group	Robin	Brown	Grand Union Alliance		D6		OPDC policies presume site-wide CHP or ambient networks. These need to be coordinated across multiple planning applications, and possibly implemented retrospectively, and carefully sited, installed and maintained to minimise heat loss. Higher air tightness requirements for MVHR suitability would also produce cost uplift.
110.b	1508	Community Group	Robin	Brown	Grand Union Alliance		D6		The OPDC has failed to propose a holistic, integrated approach to amenity and environmental standards and to fully heed the findings of the supporting studies. Policy D6 a) is only a partial, inadequate response. Additional wording is necessary to deliver the needed high standard of amenity and meet the environmental objectives/ standards, such as: While balancing cost of compliance and viability considerations, energy performance and occupant comfort, modelling requirements should be enforced and deficiencies mitigated during detailed design and fit-out stages, as well as being followed up during and post-occupancy evaluation.

Policy D7: Key views

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	204	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	D7	5.56	The current wording of this policy treats all of the types of view listed at paragraph 5.56 as 'key views' and consequently affords them all equal weight, to which we continue to object. Whilst we welcome the clarity provided in 5.57, the weight to be attributed to each view differs and we would suggest that there is a need for a more sophisticated policy which recognises these different tiers of view as well as the potential for different degrees of assessment. We also consider that the inclusion of kinetic views from elevated railway lines is inappropriate and unnecessary, and that where these are located beyond the boundary of the OPDC, the OPDC should not include them within its Local Plan unless a view is identified in the LVMF or relates to a designated heritage asset. The inclusion of these kinetic views suggests more than mere visibility – it implies that these views are important and that they should influence the design of developments in the OPDC area, with which we disagree given the transient way in which they are experienced by all.
42	205	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	D7	5.58	The supporting text at paragraph 5.58 advises that visual assessments should include verified daytime, evening and night time views as well as specifying the format of information required. This remains excessive and is detail that should be determined through an EIA scoping exercise, informed by the specific circumstances of a site and proposal.
9.b	653	Statutory Consultee	Katie	Parsons	Historic England		D7		Master planning A key cross-boundary issue for the Local Plan is the relationship of development within the OPDC area to the designated heritage assets of and within Kensal Green Cemetery. We are keen to be involved in discussions regarding the significance of views across the cemetery towards the plan area and on any forthcoming master planning work. As outlined in our previous representations, the preparation of a historic landscape setting assessment will provide a useful tool in assessing the setting of St Mary's and Kensal Green Cemeteries and helping to establish any mitigation measures that may be appropriate. Further urban design analysis and modelling work will also help inform the master planning process.
56	1176	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D7	b.	(b) is unclear and grammatically incorrect?
110.b	1509	Community Group	Robin	Brown	Grand Union Alliance		D7		Para 5.57: That Kinetic Views from along movement routes, not only the elevated ones, require a less(er) level of assessment is disputed. A dynamic succession of views can have an important impact on the perceptions of the qualities and attributes of a place and its character by a significant number of people travelling by and through the area.

Policy D8: Heritage

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	206	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	D8		We welcome the clarity provided to this policy, but continue to consider that the policy gives too much prominence to non-designated heritage assets, when the NPPF simply advises that the effect of an application on the significance of a non-designated heritage asset should be 'taken into account' by a local planning authority when determining an application. We note in particular the 'Proposed Buildings of Heritage Interest' designated on the Cargiant site, and the requirement of part c) iv. of the policy for developers to justify that 'all reasonable attempts' have been made to retain all of part of the asset if demolition is proposed. The OPDC has itself designated the demolition of these buildings through identifying Old Oak North for comprehensive regeneration, and so we see no sense in this part of the policy. Instead, we would encourage the policy to note that where the Plan designates these buildings for demolition, applicants should demonstrate how the asset has been used to inform the character of new development.
17.b	273	Strategic Partner	Debbie	Fifer	Canal & River Trust		D8	Para 5.63	We note that paragraph the supporting text (para 5.63) to include reference to relationships between heritage themes has been amended which goes some way to addressing the Trusts original comments made in respect of Policy D8 which recommended that D8 b)(ii) and/or table 5.2 could be amended so that the plan clearly requires the relationship between the heritage themes to be considered.
47	593	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		D8	5.67	D8: Heritage. The reference within paragraph 5.67 to a mechanism to fund improvements to heritage assets at risk such as at Kensal Green Cemetery is welcomed.
9.b	647	Statutory Consultee	Katie	Parsons	Historic England		D8		We welcome the inclusion of this policy but we recommend that it is strengthened by making reference to need for clear and convincing justification for any harm or loss of a heritage asset. This change will better reflect NPPF (July 2018) paragraphs 16, 154, and 194 in terms of creating a clear and positive strategy for the conservation and enhancement of the historic environment.
9.b	648	Statutory Consultee	Katie	Parsons	Historic England		D8		We recommend that Part d of the policy be reworded to state, "Proposals should be supported by a Heritage Impact Assessment which sets out" To avoid confusion that proposals will be supported i.e. approved if a HIA which sets out the criteria is simply submitted, as currently worded.
9.b	649	Statutory Consultee	Katie	Parsons	Historic England		D8	Para 5.61	Paragraph 5.61 refers to the NPPF in terms of providing protection in addition to policy D8. It is not necessary to state this in the supporting text of the policy but as it is, it may also be useful to also draw attention to the relevant pieces of legislation, such as the Town and Country Planning (Listed Building and Conservation Areas) Act 1990, the text is otherwise conspicuous for their absence. This will ensure that readers of the text are fully aware of all the relevant statutory obligations regarding heritage assets.
9.b	650	Statutory Consultee	Katie	Parsons	Historic England		D8	Para 5.67	Paragraph 5.67 states that the OPDC is not responsible for St Mary's Conservation Area or Kensal Green Cemetery. It is acknowledged that these designated heritage assets are beyond the authoritative control of the OPDC but it would be helpful for the Plan to recognise the potential for development within the OPDC area to affect them and that OPDC will take this into consideration. This would provide continuity throughout the Plan which does already recognise the contribution of setting to heritage assets as an important part of their significance. An amendment to this effect would also support the forthcoming Planning Obligations SPD.
9.b	651	Statutory Consultee	Katie	Parsons	Historic England		D8	Para 5.67	We very much welcome the additional wording which states that where appropriate contributions will be made to support the conservation and enhancement of heritage assets in neighbouring areas, this will help deliver a sound and positive strategy for the historic environment.
9.b	652	Statutory Consultee	Katie	Parsons	Historic England		D8	Table 5.2	It is recommended that Registered Parks and Gardens are included within the first column of table 5.2. These are designated heritage assets equal to listed buildings and conservation areas and a specific consideration for development within the OPDC area.
119	848	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		D8	Table 5.2	D8 5.2 outlines 5 broad historic themes including 'Historic Scrubland and open spaces. However, the Heritage classifications used; 'Conservation area', or 'Area of local character' have not been applied to the Scrubs so any description or protection for environmental or natural heritage appears absent from this section. The heritage strategy recommended Further work will be required to help define a clear strategy to protect the historic cores of the Scrubs, consider its character and reflect on the modern edges, public realm and interventions. The suggested Evidence base links are either too simplistic (Character areas study) or of a particular area (Old Oak Outline Historic Area Assessment) to be of any value in providing the evidence of value for Wormwood Scrubs. D8 Should make it clear where the heritage of open space is considered if not in this section. Chapter 6 EU 2 has the capacity to consider natural heritage but other aspects of open space heritage for e.g. recreation or sport. Supporting text should be added to clarify that Wormwood scrubs has a valuable open space heritage and further work needs to be done to understand it. This will be through the completion of a GIOSSMP. Add the Scrubs GIOSSMP to the Evidence base links when complete.
229	1003	Local Resident	Alan	Goodearl			D8		Linked to the above might be the preservation of some old buildings, to give character to the area: something to distinguish it from new districts anywhere else on the globe. I worked for a short time for the old Royal Commission on Historical Monuments and the problem was always with groups of buildings. A country house, say, might be given a sufficient grade to secure it, but how do you preserve the associated stables, workshops, barns etc that allowed it to function. There are few really outstanding buildings in the area and this is reflected in the generally low level of protection they have. It would be a shame, though, if all were to go. I went last Saturday on a good walk, organised by the development corporation, across the north of the site and we saw many interesting and characterful structures, especially along the track and canal side. I hope some can be kept, perhaps as a museum / gallery and or as studios.
55	1044	Agent	Jonathan	Stoddart	CBRE	Segro	D8		In further developing the Local Plan ahead of submission, we recommend that OPDC: Omits the designation of the St. Leonard's Road Conservation Area and the local listing of the BashleyRoad metal refinery in order to accord with national policy and to facilitate redevelopment and intensification at Park Royal;

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
55	1053	Agent	Jonathan	Stoddart	CBRE	Segro	D8		The plan proposes the introduction of a new conservation area (the St. Leonard's Road Conservation Area). This new designation is proposed on the basis of the following conclusions of the Heritage Strategy (June 2018) which forms part of the plan's evidence base: "The proposed conservation area represents the best preserved part of a much wider area of intensive industrial activity in the early 20th century. The area is notable for a cluster of early 20th century industrial buildings and is of high sensitivity to change. The buildings along St Leonard's Road form a consistent edge against the pavement, consistent with its original layout. The boundary is tightly drawn around the most distinctive survivors from the period, most of which also have group value. The boundary also includes later buildings of little or no architectural interest that could be replaced without loss of significance to the conservation area. Further work is required, particularly to assess the buildings north of Bashley Road. The boundary currently excludes the Boden building." At paragraph 127, the NPPF requires that when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest. We do not consider the explanation for designating the proposed St. Leonard's Road Conservation Area is sufficient to justify the statutory protection provided by the conservation area status. From an NPPF perspective we do not consider the current approach to be justified or consistent with national policy. Instead we recommend that a non-statutory designation, such as Proposed Areas of Local Character, is applied to the St. Leonard's Road area.
55	1054	Agent	Jonathan	Stoddart	CBRE	Segro	D8		The metal refinery site on Bashley Road is identified as a locally listed building. As per the definition of the proposed conservation area, we do not consider the existing building to be sufficiently special to warrant local listing, and so is not justified.
55	1056	Agent	Jonathan	Stoddart	CBRE	Segro	D8		The Park Royal Intensification Study (June 2018) and the resulting allocation for the Bashley Road site assumes that it is comprehensively redeveloped. We agree that comprehensive redevelopment is essential for achieving successful industrial intensification at the site, and so question the proposal to locally list the existing metal refinery building which would be a constraining factor for new development at the site. We therefore recommend that the proposed local listing of the metal refinery building is omitted from the submission version of the plan.
56	1177	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D8	d) vi	Bullet point (d) vi) is not correct as demolition in conservation areas would need planning approval anyway. (d) vi) should be replaced with: "Where appropriate, development including demolition in conservation areas will only be allowed to commence after submission of a satisfactory building contract for the replacement building."
56	1178	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D8	e)	Bullet point (e) seems to imply that merely producing an Archaeology Impact Assessment is sufficient to support a proposal.
110.b	1510	Community Group	Robin	Brown	Grand Union Alliance		D8		D8 b), c), d): The changes here are significantly, quite different and create a permissive framework for demolishing or harming the value and setting of heritage assets, and is strongly at odds with the commitments made elsewhere in the Local Plan, under Places Policies. We strongly recommend this be reverted to its original form.
110.b	1511	Community Group	Robin	Brown	Grand Union Alliance		D8	5.59	Paras 5.59, 5.61: In its regulation 19(1) response the GUA asked for Wells House Road estate to be recognised as a proposed Conservation Area rather than an Area of Local Character. To this should be added Midland Terrace which possesses similar attributes of relatively undiminished unity and character worthy of 'historic residential enclaves' of the Heritage Strategy.
29	1620	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		D8		As outlined above, Fullers strongly object to the proposed local listing of The Castle and set out at Annex 1 an assessment of the case for local listing which concludes that The Castle pub does not meet the criteria to be locally listed as set out by Historic England and Ealing Council. This has previously been submitted to the council at the draft Revised Local Plan stage and in response to the Local Heritage Listings.

Policy D9: Play space

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	207	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	D9	B)j)	Policy D9 b)j) and paragraph 5.70 continue to require dedicated play space for 0-5s to be publicly accessible within Small Open Spaces or Pocket Parks as a priority. Whilst we consider that some should, we do not think this is appropriate for all space. It will be very appropriate for some of it to be in private shared courtyards on podiums, for example, where it can be closer to home.
42	208	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	D9	b)iii)	Policy D9 b)iii) requires 4 hours sunlight on 50% of play space site, on 21 March. We consider that this is likely to be challenging given the development densities required to achieve the strategic housing targets.
33	808	National Body	Mark	Furnish	Sport England		D9		The reference to activity within Policy D9: Play Space's supporting text (paragraph 5.69) is welcomed.
56	1181	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		D9		Poor Air Quality has a major impact to the health of the people particularly the most sensitive child receptors. The design of external amenity areas in areas of poor air quality can minimise the exposure of users of the facilities to poor air quality. Amend point (iv) of Policy D9 as follows:- "iv) all dedicated child play space is located away from areas of wind turbulence, poor air quality, and noise e.g busy roads"

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
110.b	1512	Community Group	Robin	Brown	Grand Union Alliance		D9	5.72	D9 a), para 5.72: to contribute positively there are other requirements for the provision of play-space in a high density context. Building management should not restrict children from being noisy or playful in their designed play spaces. Play spaces should be designed to cushion and absorb sound and falls, rather than preventing them. Adults may need additional quiet, managed and inclusive amenity spaces. Rooftop play space does not conform to the expectations of London Plan policy on play space and should not be permitted. It is unacceptable and not in accordance with policy to enforce design solutions with a minimum of sunlight for play spaces. Please see a key paragraph, 5.4.3 from the draft new London Plan: "Where formal play provision is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city".

Chapter 6. Environment and Utilities

General Comments

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
50.b	1011	Statutory Consultee	Donatella	Cillo	Environmental Agency		General		We support the strong environmental standards you are seeking to achieve through your Environment and Utilities chapter of the plan and your commitment to biodiversity net-gain. We challenge you to make a commitment to achieve environmental net-gain as set out in 'A greener future: the Governments 25 Environment Plan'. We are happy to discuss how you might achieve this and the Environment Plan with you if this would be helpful.
110.b	1566	Community Group	Robin	Brown	Grand Union Alliance		General		World climate change, and the impact it is having on London, tells us that city resilience must be the basis to all future city development. In this regard, all buildings must be robust, well oriented to capture natural sunlight, as well as adopting systems of natural ventilation. Extensive areas of rail track can offer air rights for power generation. The water mass of the canal can be used as a source of heating and cooling. Water can be captured from all new structures to both reduce the chances of flooding but also to provide much of the water needs of a new building. A district energy plan/ circular economy are needed where all waste products can be recycled, establishing a healthy environment while underwriting the economy of the area.

Policy EU1: Open Space

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	209	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	EU1	C)	Part c) of this policy (and Policy SP8) requires 30% of the developable area outside of the SIL to be provided as public open space, which includes two 2-hectare parks in OOP. We think this could be excessive given the presence of Wormwood Scrubs which alone already accounts for over 10% of the total OPDC area.
42	210	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	EU1	iv)	Part iv) states that where it is not possible or desirable for individual developments to make on-site open space provision, a financial contribution will be sought for open space however we object to requiring payments for resident and workers separately, as both types of users will use the same open space but at different times. Consequently this approach would lead to double counting for space.
19.b	490	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		EU1		The Local Plan sets out the importance of open space as an integral component of a successful neighbourhood and the wider place making agenda. Its contribution to social cohesion, health and wellbeing is clearly recognised, as well as the economic and environmental aspects of sustainable development.
19.b	491	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		EU1		We welcome the objective of the Local Plan to deliver a minimum 30% of developable area as publicly accessible open space. However, we note this objective does not apply to areas defined as Strategic Industrial Locations (SIL), which represent a majority of the OPDC area.
19.b	508	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		EU1		There is the need for additional publicly accessible green space, particularly in Park Royal;
33	809	National Body	Mark	Furnish	Sport England		EU1	d)iv	Sport England welcomes the amended to Policy EU1: Open Space so that the function of open space should be considered and the function of open space in providing recreation and sports space is recognised in d) iv. Sport England advise that any new provision should align with robustly identified needs.
56	1182	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU1		As LBHF remains the local authority provider for the maintenance and management of open space, LBHF should be party to any plans or agreements for the maintenance of open space to ensure additional costs do not occur as a result of new development .
56	1183	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU1	a)	LBHF still have concerns with Policy EU1 (a) and reiterate previous comments. Criteria (a) states that "proposals that result in loss or harm (including erosion in the quality) of MOL will only be permitted in very special circumstances and where at least an equivalent quantum and quality of open space is provided. The second statement in bullet point a) is not considered to be in accordance with national or London Plan policy on MOL. Paragraph 7.56 in the current London Plan states that 'Development that involves the loss of MOL in return for the creation of new open space elsewhere is not considered appropriate'; MOL is granted this status for a number of reasons and cannot be 'offset' by an equivalent quantum elsewhere. This raises concerns, even if such degradation of MOL would only be allowed under very special circumstances. Suggested changes to text: a) Give metropolitan Open Land (MOL), including Wormwood Scrubs the strongest protection. Proposals that result in loss or ham (including the erosion in the quality) of MOL will only be permitted in very special circumstances as set out in the NPPF.
56	1184	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU1		Support specific reference in the Policy text to SuDS in relation to the range of functions that open space in the OPDC area should provide.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1185	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU1	Para 6.3	Welcome the commitment to integrate above ground landscaped based SuDS into streets. It is important that the design requirements of such features are considered in other relevant chapters and the planning that goes into the "place making" element of the Plan. See comments on "Places" Policies
56	1186	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU1	Para 6.17	Welcome reference to the need for open space to provide a range of functions including water management.
110.b	1513	Community Group	Robin	Brown	Grand Union Alliance		EU1	6.17	Para 6.17 Open space should also have a function of remedying deficiencies in access to open space and/or nature experienced by existing residential areas by the provision of new open space and nature rich areas closer to these homes.

Policy EU2: Urban Greening and Biodiversity

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
119	849	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		EU2		Although the local nature reserves and SINC are mapped for the Scrubs There is no detail of landscape features or areas of particular biodiversity interest as the GIOSSMP has not been completed However, the London Wildlife Trust (LWT) Phase 1 habitat survey 2016 and protected species survey 2107 already show that Wormwood Scrubs has several valuable habitats which should be protected including; <ul style="list-style-type: none"> • the embankment, one of the most valuable ecological assets of the Scrubs, supporting a remarkable variety of breeding birds • the wildflower rich grassland providing an excellent habitat for pollinating species • Some well-structured woodland with likely habitats for notable invertebrate and bird species Areas highlighted in the LWT Survey should be identified for additional protection on Figure 4.45
119	853	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		EU2		EU2 Policy Protection and enhancement of SINC's and similar habitats should be higher priority a) rather than c)
119	854	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		EU2		6.26 Studies to understand the impact of development on SINC's should also understand how they can be protected and enhanced as well as mitigated and minimised.
119	855	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		EU2		6.27 Protection to SINC's (biodiversity assets) should be comparable to protection of non-designated Heritage Assets Policy D8 a)-d)
55	1045	Agent	Jonathan	Stoddart	CBRE	Segro	EU2		In further developing the Local Plan ahead of submission, we recommend that OPDC: Explicitly acknowledges that urban greening is highly challenging to deliver within industrial developments.
55	1057	Agent	Jonathan	Stoddart	CBRE	Segro	EU2		Part d) of Policy EU2 'Urban Greening and Biodiversity' states that new development will be supported where it delivers new urban greening and ecological improvement by: i. maximising the provision of green roofs and walls; ii. wherever possible, delivering planting of mature or semi-mature trees along all streets; iii. integrating planting as part of SuDS systems; iv. integrating biodiversity into the built environment by provision of nest sites, roosts and shelters; v. ensuring that planting is ecologically appropriate and provides benefits for wildlife; and vi. delivering a range of habitats that are resilient to climate change; It also states that major development proposals will be supported where they demonstrate that they have optimised urban greening in their schemes with reference to the Urban Greening Factor and Green points system score. Developments should seek to achieve the most recent target scores within Mayoral policy / guidance or OPDC policy guidance.
55	1058	Agent	Jonathan	Stoddart	CBRE	Segro	EU2		SEGRO supports the inclusion of green and sustainable infrastructure within its developments, however we are concerned by references to green walls and green roofs, which are not compatible with the optimum design and function of industrial premises, and are likely to compromise the viability of delivering new industrial development.
55	1059	Agent	Jonathan	Stoddart	CBRE	Segro	EU2		With regards to the Urban Greening Factor, in our response to the Mayor we have expressed strong concerns about the levels currently proposed within the Draft London Plan due to the issues referenced above, together with the need to maximise external hard standing yard areas within industrial developments. External hard standing space supports the most efficient use of the yard, which is a fundamentally important requirement for our customers and many modern industrial occupiers. The viability challenges and functional compromises of urban greening in industrial developments are understood and acknowledged by OPDC officers. SEGRO therefore recommends that the following text is included within the supporting text to Policy EU2: "OPDC recognises that for industrial development, the inclusion of urban greening measures can be challenging and may not be appropriate". This acknowledgement and clarification is required to account for the very different types of new development needed across the plan period, and to ensure that new industrial development in particular is still deliverable. The recommended amendment would support the plan in being considered effective in the context of the NPPF.
56	1187	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU2		Support inclusion of a reference in the Policy text to integrating planting as part of SuDS systems.
56	1188	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU2	Para 6.25	Welcome reference to the use of planting to enhance resilience to flooding.
56	1189	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU2	Para 6.29	It is noted here (and elsewhere) that there is a reference to "green roofs". Should this be "living roofs" to encompass brown roofs? Consider changing the "green roof" reference to "living roofs" in this paragraph.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1190	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU2	Para 6.30	It is worth referencing that SuDS tree pits should be used where possible to maximise their water management potential. Include reference to SuDS tree pits in this paragraph
56	1191	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU2		<p>As part of the urban infrastructure, Green Infrastructure (GI) influences pollution dispersal and deposition. As a living thing, GI interacts with pollution formation and removal at regional and local scales. If strategically designed, GI can mitigate poor air quality on a local-scale.</p> <p>Direct experimental evidence of air pollution decreasing because of GI suggest the following:</p> <ul style="list-style-type: none"> • Trees and other GI influence wind flow. The combination of parklands, buildings, trees, and gardens creates a rough surface of different heights creating turbulence that increases mixing, and pollutant dispersion (See Fig 1). • Dense avenues of trees can trap air in narrow, enclosed streets ('street canyons') limiting mixing. If the pollution source is located inside the canyon this causes fumigation. If the source is located outside of the canyon this prevents mixing into the canyon, creating locally cleaner air. (See Fig 2) • GI, such as hedges, can be used as a barrier to increase the pathway between pollution source and receptor, which increases mixing and reduces pollutant concentration. (See Fig 3) <p>The Figures referenced and further useful information can be found online in the guidance document- " First Steps in Air Quality for the Built Environment Practitioners Technical Report (2018) http://www.tdag.org.uk/first-steps-in-urban-air-quality.html</p> <p>Amend point (d) and (i) of Policy EU2 as follows:-</p> <p>d) deliver new urban greening and ecological improvement in accordance with Phytosensor Toolkit, Citizen Science, May 2018 and 'First Steps in Urban Air Quality', TDAG, 2017 guidance by:</p> <p>i) maximising the provision of green roofs, walls and green screens;</p>

Policy EU3: Water

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
207	53	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		<p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory sewerage undertaker for parts of the southwestern area of the district and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012.</p> <p>General Comments</p> <p>Thames Water responded to the previous consultation on the 30th March 2016 and have been working with the Development Corporation and GLA in relation to the development of the Integrated Water Management Strategy (IWMS) which forms part of the evidence base for the Local Plan.</p> <p>Thames Waters main concern is to ensure that the Local Plan delivers on the outcomes of the IWMS and to ensure that the Local Plan is sufficiently robust in relation to the supply of potable water and requirements for SuDS and foul water drainage. In this context we responded at the previous stage in relation to suggested changes to Policy EU3 to support the delivery of the IWMS and minimising the use of potable water.</p>
207	54	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3	6.36	<p>Within Section 6.36 references have been added to make specific reference to Counters Creek. The section now reads: "Thames Water has indicated that the existing Counters Creek combined sewer has no capacity to accept increased flows." The reference is now considered to be misleading as the capacity concerns relate to the Counters Creek sewer catchment and not just a single sewer. While there is capacity within the network ordinarily, due to the combined nature of the network the catchment has suffered from sewer flooding incidents at times of heavy rain. New development will increase the dry weather flows into the network and as such it is critical that surface water flows into the network are reduced to compensate for increased dry weather flows. It is suggested that the text within Section 6.36 is revised to read: "Thames Water has indicated capacity concerns regarding the Counters Creek sewer catchment. Addressing the root cause of sewer overload (rainfall runoff), through the application of Sustainable Drainage Systems (SuDS) to reduce the impact these flows have, is required in order to provide a resilient approach</p>
207	55	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		<p>Supporting text to Policy EU3</p> <p>Currently while greenfield runoff rates are sought it is often argued that it is technically impractical to reduce surface water flows below 5 l/s as this causes blockages. However, the latest CIRIA SuDS Manual justifies that flow rates can be restricted to 2 l/s. Consequently, further to our previous comments in relation to Policy EU3, it is considered that either the supporting text at Section 6.38 should be revised or additional text should be added to state that "for all development sites of less than 1 ha the SuDS hierarchy set out in Policy EU3 should be followed to ensure that surface water runoff does not exceed greenfield runoff rates. In all circumstances discharge rates should not exceed 2 l/s as supported by the CIRIA SuDS Manual."</p>
207	56	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		<p>Site Specific Comments</p> <p>Comments on water and wastewater infrastructure issues are appended to this letter for information. In order to ensure that the potable water and drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames Water Developer Services in advance of the submission of planning applications and to discuss with OPDC and Thames Water how the development will contribute towards the delivery of the IWMS.</p> <p>Information for Developers on water/wastewater infrastructure can be found on Thames Water's website at: http://www.thameswater.co.uk/developers/1319.htm</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
207	57	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		2 Portal Way: Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers. There are private sewers crossing the site. A diversion of these assets will need to be agreed with the developer.
207	58	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		3 Portal Way Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers.
207	59	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		40 54a Mineva Road Water Response: On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site. Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site only has access to a foul sewer. Appropriate provision for surface water will need to be made.
207	60	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Acton Wells East Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). There are public sewers crossing the site.
207	61	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Algerian Embassy Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site only has access to a foul sewer. Appropriate provision for surface water will need to be made. We note that there is a private sewer in the vicinity.
207	62	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Bashley Road Metal Refinery Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers. There are public sewers crossing the site.
207	63	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Big Yellow Storage (Scrubs Lane) Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: An appropriate point of connection into the sewer will need to be established and agreed for this site. Note that direct connection to the trunk sewer may not be permitted. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). The Wood Lane Trunk

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
									Sewer passes through the site. Careful consideration of the site configuration will be required to allow appropriate access to this strategic asset. There are public sewers crossing the site
207	64	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Boden House Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). There are public sewers crossing the site.
207	65	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Cargiant Water Response: The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Clean Water Modelling impact studies of the existing water supply infrastructure have been completed outlining the required upgrades required for this development. Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). The Wood Lane Trunk Sewer and the Stamford Bridge Trunk Sewer passes through the site. Careful consideration of the site configuration will be required to allow appropriate access to these strategic assets. There are public sewers crossing the site.
207	66	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Channel Gate Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . Careful consideration of foul water connection points will be required. It is likely that some of the existing local foul sewers are not sized for the scale of this development. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers. Clear demonstration of how the surface water disposal hierarchy has been implemented for this site will need to be demonstrated before connection into a sewer will be considered.
207	67	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Cumbernauld Business Park Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). There are public sewers crossing the site
207	68	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		EMR Water Response: The supply required for the proposed scale of development is a significant additional demand in the Water Resource area. Currently the mains that feed the Water Resource area are running close to capacity. Consequently it is likely that the developer will be required to provide an impact study of the existing infrastructure for the brownfield sites and smaller infill development in order to determine the magnitude of spare capacity and a suitable connection point. The developer will be required to fund this. As set out in the Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). There are public sewers crossing the site.
207	69	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		First Central Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
									Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . The surface water drainage strategy for this development should follow policy 5.13 of the London Plan. Typically greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for surface water disposal as follows; Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse > Discharge rainwater direct to a surface water sewer/drain > Discharge rainwater to the combined sewer
207	70	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Harrow Road Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: An appropriate point of connection into the sewer will need to be established and agreed for this site. Note that direct connection to the trunk sewer may not be permitted. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). The Mid Level Trunk Sewer No. 2 passes through the site. Careful consideration of the site configuration will be required to allow appropriate access to this strategic asset. There are public sewers crossing the site.
207	71	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Holbrook House Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers.
207	72	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Land East of the Victoria Centre Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers.
207	73	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Mitre Industrial Estate Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). The site is served by both a surface water and combined sewer. We will not support surface water flows into the combined sewer. The Mid Level Trunk Sewer No. 1 passes through the site. Careful consideration of the site configuration will be required to allow appropriate access to this strategic asset. There are public sewers crossing the site.
207	74	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Mitre Wharf Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: An appropriate point of connection into the sewer will need to be established and agreed for this site. Note that direct connection to the trunk sewer may not be permitted. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). The Wood Lane Trunk Sewer passes through the site. Careful consideration of the site configuration will be required to allow appropriate access to this strategic asset. Clear demonstration of how the surface water disposal hierarchy has been implemented for this site will need to be demonstrated before connection into a sewer will be considered.
207	75	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Mitre Yard: Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
									is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1).
207	76	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		North Kensington Gate South Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: An appropriate point of connection into the sewer will need to be established and agreed for this site. Note that direct connection to the trunk sewer may not be permitted. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1).
207	77	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Oaklands North Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Waste Response: This site is not served by a sewer. Appropriate access needs to be identified and procured. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). Clear demonstration of how the surface water disposal hierarchy has been implemented for this site will need to be demonstrated before connection into a sewer will be considered.
207	78	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Oaklands South Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site only has access to a foul sewer. Appropriate provision for surface water will need to be made. We note that there is a private sewer in the vicinity.
207	79	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Old Oak Common Lane Sites Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site only has access to a foul sewer. Appropriate provision for surface water will need to be made.
207	80	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Old Oak Common Station and surroundings Water Response: The supply required for the proposed scale of development is a significant additional demand in the Water Resource area. Currently the mains that feed the Water Resource area are running close to capacity. Consequently it is likely that the developer will be required to provide an impact study of the existing infrastructure for the brownfield sites and smaller infill development in order to determine the magnitude of spare capacity and a suitable connection point. The developer will be required to fund this. As set out in the Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended. Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). There are public sewers crossing the site.
207	81	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Park Royal ASDA Water Response: The supply required for the proposed scale of development is a significant additional demand in the Water Resource area. Currently the mains that feed the Water Resource area are running close to capacity. Consequently it is likely that the developer will be required to provide an impact study of the existing infrastructure for the brownfield sites and smaller infill development in order to determine the magnitude of spare capacity and a suitable connection point. The developer will be required to fund this. As set out in the Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended. Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers. There are public sewers crossing the site.
207	82	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Perfume Factory North Water Response: On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in

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									relation to this site. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers. There are public sewers crossing the site.
207	83	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Perfume Factory South Water Response: On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site. Waste Response: A gravity connection to the existing foul sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers. There are public sewers crossing the site.
207	84	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Portal West Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers.
207	85	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Tea Crate Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Waste Response: An appropriate point of connection into the sewer will need to be established and agreed for this site. Note that direct connection to the trunk sewer may not be permitted. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1).
207	86	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		The Portal Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response: A gravity connection to the existing combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). The site is served by both a surface water and combined sewer. We will not support surface water flows into the combined sewer.
207	87	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		The Triangle Business Centre Water Response: The supply required for the proposed scale of development is a significant additional demand in the Water Resource area. Currently the mains that feed the Water Resource area are running close to capacity. Consequently it is likely that the developer will be required to provide an impact study of the existing infrastructure for the brownfield sites and smaller infill development in order to determine the magnitude of spare capacity and a suitable connection point. The developer will be required to fund this. As set out in the Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended Waste Response: A gravity connection to the existing foul/combined sewer system would be the preferred method of connection. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). There are public sewers crossing the site.
207	88	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		Victoria Industrial Estate Water Response: The supply required for the proposed scale of development is a significant additional demand in the Water Resource area. Currently the mains that feed the Water Resource area are running close to capacity. Consequently it is likely that the developer will be required to provide an impact study of the existing infrastructure for the brownfield sites and smaller infill development in order to determine the magnitude of spare capacity and a suitable connection point. The developer will be required to fund this. As set out in the Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site has access to both foul and surface water sewers. We expect the flow off the site to connect to their foul water flow to the foul sewers and surface water flow to the surface water sewers. There are public sewers crossing the site.

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207	89	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		<p>Westway Estate</p> <p>Water Response: The supply required for the proposed scale of development is a significant additional demand in the Water Resource area. Currently the mains that feed the Water Resource area are running close to capacity. Consequently it is likely that the developer will be required to provide an impact study of the existing infrastructure for the brownfield sites and smaller infill development in order to determine the magnitude of spare capacity and a suitable connection point. The developer will be required to fund this. As set out in the Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended.</p> <p>Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). There are public sewers crossing the site.</p>
207	90	Utilities Provider	Richard	Hill	Savills	Thames Water	EU3		<p>Willesden Junction Maintenance Depot</p> <p>Water Response: The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</p> <p>Waste Response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. The peak surface water discharge needs to be at Greenfield run-off rates. For sites below 1 ha we expect a minimum discharge rate of 2 l/s/ha as outlined in the CIRIA SuDS Manual (Section 3.3.1). This site only has access to a foul sewer. Appropriate provision for surface water will need to be made. Clear demonstration of how the surface water disposal hierarchy has been implemented for this site will need to be demonstrated before connection into a sewer will be considered.</p>
47	594	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		EU3		<p>The Council supports the positive approach referred to in point a, the aim not to exceed greenfield rates of surface water run-off and the principle of the sequential approach to reduce surface water run-off referred to in point b. However, the track changes show what it seems a downgrading of the strategic SuDS which are now located at the bottom of the hierarchy "Where source control SuDS features cannot achieve sufficient attenuation, delivering and/or contributing to strategic SuDS, which should be incorporated into streets, open spaces and other public realm areas;". The reason given for this change is "to clarify implementation of policy requirements and align with Utilities Study". Yet, the Utilities Study does not seem to have been modified since the last consultation (April 2017). In relation to this, a new sentence has been added at the end of paragraph 6.38. It reads: "Where on-site attenuation cannot achieve run-off rates, applicants should consider off-site strategic attenuation measures, integrated within public open spaces and highway networks." Reference to greenfield run-off rates should be added to reinforce the policy.</p>
47	595	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		EU3	C)	<p>The new point c reads: "ensure sufficient capacity within the sewerage network by, as part of applicants' Water Efficiency, SuDS and Drainage Statement, demonstrating how the development will enable capacity to be released within the existing combined sewer network to accommodate additional foul water flows, without compromising the ability of other developers to meet future development needs;" This could potentially lead developers to reduce enough surface water run-off entering the sewer system to compensate for the foul flows created by the development which could create a conflict with point b of the policy. This policy may not be needed if point b is met.</p>
47	596	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		EU3	D)	<p>Please note that the new reference in point d should read: "the Thames River Basin Management Plan" (as opposed to Basement). This should be checked throughout as it is wrong in the supporting text.</p>
47	597	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		EU3		<p>In our previous response we pointed out that the reference to the acute lack of capacity in the Counters Creek sewer disappeared from the draft policy included for Regulation 18. Although this is referred to in the policy formulation report, the only proposed change is to the supporting text and not to the policy as requested. The Policy Formulation Report (pages 65, 66) explains that the Canal and River Trust support surface water discharge into the canal. This is welcomed as one of the most sustainable ways of addressing surface water runoff. This report also states in page 67 that our previous comment on Flood Risk Assessments in Critical Drainage Areas has been addressed with new wording in point e which refers to DEFRA and EA guidance. However, the government guidance on flood risk assessments in critical drainage areas states: "an area within flood zone 1 which has critical drainage problems as notified by the Environment Agency". It is our experience that the Environment Agency will not notify the authority of the critical drainage problems and it is for the Planning Authority (in partnership with the Lead Local Flood Authority) to designate these areas and to spell out in policy that Flood Risk Assessments are required in these areas. Although new development expected in the OPDC would usually be major development and therefore, it may trigger the need for a Flood Risk Assessment, the policy as it is currently worded could leave development in critical drainage areas without the requirement for a Flood Risk Assessment. This is vital as these assessments addresses the risk of flooding onsite and offsite (as a result of development). A thorough Flood Risk Assessment will also support Drainage Strategies and lead to reduction of surface water run-off. The policy wording could be modified to read: "undertake Flood Risk Assessments (FRAs) for schemes meeting the thresholds set out in DEFRA and EA guidance and the critical drainage areas designated in the Integrated Water Management Strategy". The need for Flood Risk Assessments should also be reflected in paragraph 6.39.</p>
50.b	1014	Statutory Consultee	Donatella	Cillo	Environmental Agency		EU3		<p>We are pleased that your local plan makes a commitment to deliver healthy streets as outlined in the Mayor's Transport Strategy. However, we would suggest you to consider what contribution you can play in delivering proposal 44 of the Mayor's Transport Strategy, which commits to removing 50,000 m3 of impermeable surfaces on the transport network and replacing them with permeable surfaces and surfaces draining to</p>

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									SuDS features, rather than the sewer network. Based on the scale of change proposed to the transport network within OPDC, it would appear that this presents a great opportunity to significantly contribute to this figure.
50.b	1021	Statutory Consultee	Donatella	Cillo	Environmental Agency		EU3		We are pleased to see that this policy now refers to the requirement of the Thames River Basin Management Plan within bullet d). Bullet point e) states that Flood Risk Assessments (FRAs) should meet the thresholds set out in Defra and EA guidance. Please note that any site specific FRAs will need to comply with the requirements set out in paragraphs 102 and 103 of the NPPF or with paragraph 10, ID number 7-010- 20140306 of the National Planning Practice Guidance (NPPG). We therefore recommend this bullet point within policy EU3 is amended to reflect national policy and guidance.
56	1192	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3		There is concern about the Hierarchy presented in the Policy as this is not consistent with the London Plan or the H&F Local Plan. In particular, there is no reference in the Hierarchy to the collection of rainwater for re-use, which is at the top of the London Plan Drainage Hierarchy. Align the Drainage Hierarchy in this Policy with that presented in the London Plan to highlight the importance of rainwater harvesting.
56	1193	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3		Development in the OPDC area will create a significant demand for potable water and we would expect that collecting and re-using water would be promoted by the OPDC's Hierarchy above the use of direct discharge to the canal. The Drainage Hierarchy needs amending as outlined above otherwise complying with this requirement of the Policy would be difficult.
56	1194	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3		The reference to needing to comply with any relevant requirements of local authority Surface Water Management Plans (SWMPs) and the Thames River Basement Management Plan is logical but if the OPDC Hierarchy is not consistent with the London Plan or Local Plan documents then it is also likely to not be in line with SWMPs and possibly not the TRBM Plan either. How would these conflicts be expected to be resolved? Clarifications would be useful on these points.
56	1195	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3		Reference is made to the Integrated Water Management Strategy. Will this be updated at any point? Also, will an OPDC specific SWMP be developed or is the intention to rely on the SWMPs carried out by the local authorities?
56	1196	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3		Consideration should be given to adding a specific bullet point on the topic of sewer flood risk and the need to mitigate and protect basement properties against sewer surcharge flood risk. Add a new bullet point which references the risks of sewer flooding.
56	1197	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3		The requirement to maximise the efficient use of potable water is supported, although we are not sure how this sits with the other requirements of the policy in terms of water management and the use of direct discharge of rainwater into the canal. As highlighted above, increased emphasis on rainwater harvesting to help reduce the demand for potable water for uses where it is not necessary to use drinking quality water (e.g. for irrigation or toilet flushing) is recommended.
56	1198	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.34	Reference is made to the Integrated Water Management Study. One of the key recommendations of the Study was "For potable water, recommendations include the need for rainwater harvesting and greywater re-use to achieve as close as possible to neutrality in water use". Although there is reference to the use of these methods to help manage demand, greater emphasis could be given to this in the Policy by revising the way the Hierarchy promotes certain measures. As commented above in relation to the Policy text, a revised Drainage Hierarchy which promotes rainwater harvesting more would help show consistency with the recommendations of the IWMS in our view.
56	1199	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.35	How will the "appropriate contributions" mentioned here be calculated? Clarification on this point required
56	1200	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.37	Has any work been done to calculate the potential volumes of surface water that might be directed into the canal to assess whether or not such an approach is viable? What are the treatment requirements for the run-off being managed in this way to protect the water quality of the canal? Further details would be useful to show that the policy is viable.
56	1201	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.38	The Hierarchy is discussed here along the lines of discharging run-off to the canal where possible, but where this cannot be utilised to manage all run-off as required, then on-site vegetated SuDS measures such as rain gardens, green roof etc are to be used. These types of landscaped based SuDS provide a range of benefits in addition to flood mitigation – they provide biodiversity benefits, amenity benefits, urban heat island benefits, air quality and noise barrier benefits and so on. For this reason we think that the prioritisation of direct discharge should be reconsidered. As already raised above, we think that the focus of the Drainage Hierarchy on direct discharge may mean that other SuDS measures, which can provide a range of additional benefits, will not be implemented. The way to resolve this is to amend the Hierarchy as outlined above.
56	1202	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.38	The following text has been added to this paragraph: "Where on-site attenuation cannot achieve run-off rates, applicants should consider off-site strategic attenuation measures, integrated within public open spaces and highway networks". If water cannot be dealt with on-site it can be dealt with strategically offsite in open spaces and highways – but this is not ideal for the Scrubs, and the same goes for highways. We don't believe any Highway Authority will adopt a highway with water flowing into it from private land (Highways Act 1980), therefore it will only work under a special condition or on privately owned roads. Further consideration needs to be given to the off-site attenuation measures that might be considered to be preferred or not appropriate to avoid undesirable proposals coming forward.
56	1203	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.39	We agree that Development proposals should be required to alleviate localised surface water drainage problems as stated in this section.
56	1204	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.39	However, this paragraph requires information to be submitted by major development proposals to demonstrate compliance with the requirements set out in the OPDC Local Plan and also any relevant local authority requirements /standards for drainage, in their role as LLFA. As highlighted above, the OPDC Local Plan as drafted is not consistent with the London Plan or the H&F Local Plan, so it will not be

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									possible for proposals to demonstrate compliance with both. How will this conflict be resolved? Amending the Hierarchy so that it is consistent with the London Plan would resolve this problem.
56	1205	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.41	We support the need for developments to maximise reduction in potable water demand. We note that whereas the previous draft of Policy EU3 included a target in this respect, that it has been removed in this revised draft. Inclusion of a target should be reconsidered as this will help guide development designs and ensure that water use is minimised.
56	1206	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU3	Para 6.43	This paragraph discusses targets for non-residential buildings, but these have not been included in the Policy itself. Include reference to the targets in the policy text.

Policy EU4: Air Quality

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17.b	274	Strategic Partner	Debbie	Fifer	Canal & River Trust		EU4	Para 6.52	We have previously provided comments in respect of the impact of new development along both sides of the canal leading to a canyoning effect (similar to that which policy EU4 seeks to avoid for streets). We note a new reference in paragraph 6.52 to "The design and layout of the new development including the orientation, massing and height of buildings and location of social infrastructure and open space influence exposure to poor air quality. Where possible, development should be designed to minimise exposure to pollution especially for vulnerable communities like young children, older people and people suffering from respiratory and other related illnesses. Whilst this does not address the Trusts original concerns we do consider this new wording to be a positive addition to the policy.
56	1207	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4		Local authorities are the regulatory authority with specific responsibility for the management of Air Quality within their boundary under the 1995 Environment Act – Part IV. As LBHF borough is an Air Quality Management Area it is essential that the impacts of development in the OPDC area are agreed with the Council whose responsibility it is under this act to ensure that air pollution is being adequately addressed. This should be established in this policy. Although it is identified that assessments would be necessary, it should be specified that these must be agreed in writing with the individual local authorities including any proposed submissions or actions regarding the assessment of air quality and any subsequent mitigation for air pollution. Amend Policy EU4 as follows:- "Development proposals will be supported where they do not result in the deterioration in local air quality and make a positive contribution to overall improvement in air quality by: a) submitting an Air Quality Assessment in consultation and agreement with the Local Authority..."
56	1208	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4		Another significant mitigating factor is that the European Commission has issued the UK with a 'Letter of Formal Notice' for breaching NO2 limit values. Defra and the GLA have written to the Council calling for cooperation in tackling the problem, but also reminding us of Government powers that could require local authorities to pay the associated EU fines. Fines could therefore be levied on the Council if there are exceedances as a result of this development although its management would not be in the Council's control. OPDC Plan EU4 policy should take into account LBHF air quality planning policy (CC10).
56	1209	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	b)ii)	London is failing to meet the legal limit for NO2. Particulate matter is damaging to health at any level and must be reduced. London is currently far from achieving WHO health-based limits for PM2.5. WHO guidelines, are driven solely by the available health evidence and as a result are set much tighter for PM10 and PM2.5. Inclusion of compliance with air quality legal standards is important and welcomed, however benefits to health can be seen by further reduction below legal standards. Indeed, current air quality legal standards do not reflect the World Health Organisation guidelines for Particulate Matter for example. It should encourage filtration of air for particulate matter even if meeting legal standards, if filtration is necessary for nitrogen dioxide already for example. The Major of London 'London Environment Strategy' May 2018 states Improving London's air quality requires the following actions: • establishing and achieving new, tighter air quality targets for a cleaner London, meeting World Health Organization (WHO) health-based guidelines by 2030 Amend point (ii) of Policy EU4 b to refer to WHO AQ guidance as follows:- "ii) potential exposure to pollution above the WHO Air Quality Guideline values; and..."

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56	1210	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	c)i)	See council response for EU 4 b(ii) Amend Policy EU4 as follows:- i) emissions, particularly of nitrogen dioxide (NO2) and particulate matter, including PM10 and PM2.5, to meet the WHO Air Quality Guideline Values; and
56	1211	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	c)ii)	See council response for EU 4 b(ii) Amend Policy EU4 as follows:- ii) exposure to below the WHO Air Quality Guideline Values
56	1212	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	e)	See council response for EU 4 b(ii) Amend Policy EU4 as follows:- e) helping to reduce pollution in air quality focus areas, identified in figure 6.6, to comply with WHO Air Quality Guideline Values and the most up to date national air quality standards
56	1213	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	f)	See council response for EU 4 b(ii) Amend Policy EU4 as follows:- f) delivering and/or contributing to the provision of new automatic monitors and diffusion tubes, with equipment to monitor NO2 and PM2.5, PM10, at locations identified in figure 6.6
56	1214	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	h)	See council response for EU 4 b(ii) Amend Policy EU4 as follows:- h) meeting EU, WHO Air Quality Guideline Values or subsequent nationally established health-based standards and objectives for NO2 and PM2.5, PM10 and other particulates.
56	1215	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Table 6.1	All parking spaces including for servicing and deliveries should have electric vehicle charging points to encourage and incentivise the use of Zero tailpipe emission vehicles. Amend Table 6.1- Transport as follows:- "Minimise demand for travel by private motor vehicles and encourage transport by shared, low and zero emission modes. <ul style="list-style-type: none"> • Provide a maximum of 1 car parking space with per 5 residential units. • All car parking spaces including those for servicing and deliveries shall have active provision for electric vehicle charging points. • Provide dedicated cycle lanes and attractive pedestrian routes. • Design local roads to restrict vehicle speeds to 20mph. • Enhance integrated rail, London Underground, London Overground and Zero Tailpipe emission bus provision and prioritise sustainable transport through careful management of traffic. • Provide Zero Emission tailpipe compliant taxi ranks"
56	1216	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Table 6.1	See council response for EU4 and EU b(ii) Amend Table 6.1- Overall Emissions as follows:- "Proposals should not increase the area of exceedance of WHO established air quality health-based standards and objectives for NO2, PM2.5, and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality."

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1217	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Table 6.1	See council response for EU4 b(ii) Amend Table 6.1- Monitoring as follows:- "Support the installation of new automatic monitors for NO2 and PM2.5, PM10 on main A-roads (see figure 6.6) and around stations in the area and in adjacent areas of high concentrations of pollution".
56	1218	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Table 6.1	See council response for EU4 (i) Amend Table 6.1- Design & Public Realm as follows:- <ul style="list-style-type: none">• "Development and building design shall minimise exposure to elevated levels of air pollution by ensuring they are orientated away from the main sources of poor air quality e.g. Highly trafficked roads• Development and building design should not inhibit the effective dispersion of pollution e.g. street canyons. In particular, bus and taxi facilities, combustion based energy plant should be designed to avoid the build-up of pollution or increase public exposure to elevated levels of pollution.• Developments should provide adequate, appropriate, and well located green space and urban greening in accordance with Phytosensor Toolkit, Citizen Science, May 2018 and 'First Steps in Urban Air Quality', TDAG, 2017 guidance to help reduce pollutant concentrations across the area".
56	1219	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Para 6.48	See council response Table 6.1- Transport Amend Para 6.48 as follows:- "In addition, to promote better air quality associated with transport, OPDC will also work with applicants to ensure all parking provision shall have active electric vehicle charging points, and the electricity grid is designed to enable this (see Policy T4)".
56	1220	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Para 6.50	Locations of new Air Quality Monitoring locations including new urban background sites in Air Quality Management Area's should be agreed in consultation with the relevant Local Authority. The siting of the monitoring locations should comply LLAQM Technical guidance (LLAQM.TG (16)) Amend Para 6.50 as follows:- "There is a need for additional monitoring in some areas not covered by the network to enable applicants to prepare Air Quality Assessments in support of planning applications. The new Air Quality Monitoring Stations will be sited in accordance with LLAQM Technical guidance (LLAQM.TG (16)). The place policies within this Local Plan support the improvement of air quality by requiring development to contribute to and/or deliver measures...."
56	1221	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Para 6.54	See council response for EU 4 b(ii) Amend Para 6.54 as follows:- "OPDC will adopt WHO established health-based standards and objectives for a number of air quality indicators (NOX, PM10 and PM2.5) until these are superseded by new UK standards...."
56	1222	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Para 6.55	See council response for EU 4 b(ii) Amend Para 6.55 as follows:- "Monitoring and modelling of pollutant concentrations has shown that concentrations in the area are between 5% below or above the WHO Air Quality Guideline values for NO2, PM2.5 and PM10 across wide areas of Old Oak and Park Royal. As a result, CHP & Biomass Plant, Ultra Low NOx Gas fired boilers and associated abatement technologies shall meet a minimum dry NOx emissions standards of 40mg/Nm-3 (at 5% O2) and 40 mg/kWh (at 0% O2) respectively." (remainder of paragraph deleted)
56	1223	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU4	Para 6.56	See council response for EU 4 b(ii) Amend Para 6.56 as follows:- In addition, energy and waste facilities should be carefully positioned and designed to ensure that emissions do not result in the exceedance of the WHO Air Quality Guideline values for NO2, PM2.5 and PM10 local residential development or civic amenities including schools, community, sport and health centres.
110.b	1514	Community Group	Robin	Brown	Grand Union Alliance		EU4		EU4 a), b), c): Whist policy has been strengthened and requires assessments and mitigations within an Air Quality positive objective, the combination of tall and high buildings and intense density inevitably producing canyon like streets will make the achievement of this problematical. Careful attention, at least, is needed to building and plot morphology.
110.b	1515	Community Group	Robin	Brown	Grand Union Alliance		EU4		EU4 h): The additional traffic demands placed on the surrounding major road network, its junctions, and key routes within Old Oak and Park Royal from the increased population and economic activity will compound the existing illegal exceedances beyond EU values presently recorded, rendering this part of policy ineffective.

Policy EU5: Noise and Vibration

No Comments

Policy EU6: Waste

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
26	100	Strategic Partner	Archie	Onslow	North London Waste Plan		EU6		I am writing to you on behalf of the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the "North London Boroughs") who are working together to prepare the North London Waste Plan (NLWP). Thank you for inviting us to comment on Old Oak and Park Royal Development Corporation's (OPDC) second revised Local Plan. We provided comments on the previous consultation and would like to stand by those comments.
26	101	Strategic Partner	Archie	Onslow	North London Waste Plan		EU6		We have reviewed the revised policies and a number of new studies relating to waste. We particularly welcome the Waste in tall buildings study as a contribution to improving performance in this area. This will be of interest to planning authorities across London. It is surprising that more is not made of this report and its content in policy EU6 where the reference still is to (unreferenced) LWARB guidance.
26	103	Strategic Partner	Archie	Onslow	North London Waste Plan		EU6		There is reference in the plan and in the waste apportionment study to joint working with Western Riverside Waste Authority boroughs on a technical paper but no reference to any pooling of apportionment and joint working beyond that. Such pooling arrangements are common in London. They have been carried through joint waste plans in North, South, East and West London and through a joint technical paper and local plans in South East London. The pooling arrangements have enabled boroughs to meet their apportionment targets and plan for waste. Experience shows that boroughs not in such groupings struggle to achieve their apportionment targets. This impacts on the ability of London as a whole to meet the net self-sufficiency target in the London Plan. This is also of significance to North London boroughs because these lone boroughs then make overtures to join other groupings with whom there is not such a natural affinity and this creates additional pressure on the groups they approach. While I appreciate the OPDC is but one player in the Western Riverside grouping, I invite the Inspector to consider whether a pooling of apportionment is in the best interests of Western Riverside boroughs and of London as a whole.
115	296	Local Resident	Nye	Jones			EU6		Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
210	306	Local Resident	Gail	Dobinson			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
212	315	Local Resident	Natasha	Salkey			EU6		The idea of bringing such a huge amount of new people into this area and at the same time expand the waste management capacity of the Powerday site at Old Oak Sidings is preposterous! Powerday waste site has caused untold misery and health hazards for local residents since it opened and which continue to the day of this response; it is outrageous that the OPDC should seek to expand this site – another waste management option must be found.
212	318	Local Resident	Natasha	Salkey			EU6		Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas. Living next to the Club House (Goodhall/Stephenson street) already proves this point! Even though on paper this building was designed with its own waste management facility!
213	324	Local Resident	Rachel	Ritfeld			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
213	337	Local Resident	Rachel	Ritfeld			EU6		TITRA is also very concerned that despite its focus on high density development and tall buildings, that Policy EU6 is not considering new ways to collect, store and deal with the greatly-increased waste requirement that will generated by such development. In addition, it does not bring forward ways to properly enforce effective waste collection and recycling that will result form over-development of Old Oak. Policy EU6 merely repeats the usual call for: "adequate provision for waste storage and collection within developments, in accordance with the London Waste Recycling Board's (LWARB) guidance on recycling and storage, ensuring: i) source segregation of bio-waste and other recyclables; ii) control of odour, nuisance and air and noise pollution from waste collection; and iii) working with waste authorities to ensure waste collection approaches align with current and future waste collection arrangements..." But policy EU6 undermines its own policy by acknowledging on p177 that "Average recycling rates in inner city areas, particularly in areas with tall buildings, in London are less than 30%." Since the Local Plan is aiming to add at least 22,000 homes into a small district of London, local residents want to see a far more strategic and practical and accountable policy in the Local Plan to deal with a problem that it is in effect creating on a greater scale.
213	338	Local Resident	Rachel	Ritfeld			EU6		In addition, the policy documentation does not discuss local authorities such as Ealing Council's failure to enforce effective segregation of waste and recyclable material on its part of the Old Oak development zone. If an under-funded local authority cannot manage waste and enforces controls on houses in multiple occupation (HMOs) and organise enforcement on basic requirements of landlords that they must provide waste collection and recycling and social impacts such as fly-tipping, it is highly inappropriate for the Local Plan to advocating development on this scale without fresh thinking on waste management and its control.
213	339	Local Resident	Rachel	Ritfeld			EU6		TITRA is extremely worried that the planned over-development of Old Oak, the lack of emphasis on building up much greater space within buildings for on-site waste collection and the failure to promote far greater recycling rates, will cause very serious problems in waste and recycling storage in Old Oak in the years ahead. TITRA thinks that Policy EU6 is ineffective and unsound.
214	348	Local Resident	Ciara	Solmi			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
218	382	Local Resident	Liz	Abraham			EU6		<p>I am sorry I have not yet been able to go through the whole draft plan, however I wish to send my immediate objection to a potential proposal.</p> <p>Item 6.76 in the Environment and Utilities chapter states:</p> <p>"OPDC's Utilities Study identifies that the Old Oak Sidings site could potentially form part of a strategic heat and energy network. It could also provide for bio-waste recovery."</p> <p>Old Oak Sidings is occupied and run by Powerday and as a close neighbour of this company I would like to inform you of their horrendous track record not only in protecting our environment from their waste but in particular the problems we have had whenever they have any bio material. I have had to make numerous complaints to the Environment Agency as a result of the bad odours emanating from this company. At times having to close my windows in the middle of the summer and sometimes the stench of rotting refuse has come through even when windows are closed, i assume through my chimneys. We have also had severe problems with excessive flies which at times I am sure have come from Powerday's operations.</p> <p>I am already concerned that they are being allowed to remain near your additional housing, however I must express deep concern to any proposal to extend their licence to manage more biological material. Their track record is poor and I hope that this objection will be listened to and heeded.</p>
32	386	Local Resident	Bernie	Timmins			EU6		<p>I object to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.</p>
219	445	Local Resident	Jane	Dreaper			EU6		<p>TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas. IN OUR AREA WE ALREADY HAVE A RE-DEVELOPMENT WHICH CAUSES SERIOUS PROBLEMS WITH ITS APPALLING LACK OF WASTE MANAGEMENT. HOW WILL YOU ENSURE SUCCESSFUL SYSTEMS ARE ACTUALLY OUT IN PLACE?</p>
220	454	Local Resident	M.	Szoke			EU6		<p>TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.</p>
221	463	Local Resident	James	Trew			EU6		<p>TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.</p>
221	476	Local Resident	James	Trew			EU6		<p>TITRA is also very concerned that despite its focus on high density development and tall buildings, that Policy EU6 is not considering new ways to collect, store and deal with the greatly-increased waste requirement that will generated by such development. In addition, it does not bring forward ways to properly enforce effective waste collection and recycling that will result form over-development of Old Oak. Policy EU6 merely repeats the usual call for: "adequate provision for waste storage and collection within developments, in accordance with the London Waste Recycling Board's (LWARB) guidance on recycling and storage, ensuring: i) source segregation of bio-waste and other recyclables; ii) control of odour, nuisance and air and noise pollution from waste collection; and iii) working with waste authorities to ensure waste collection approaches align with current and future waste collection arrangements..."</p> <p>But policy EU6 undermines its own policy by acknowledging on p177 that "Average recycling rates in inner city areas, particularly in areas with tall buildings, in London are less than 30%." Since the Local Plan is aiming to add at least 22,000 homes into a small district of London, local residents want to see a far more strategic and practical and accountable policy in the Local Plan to deal with a problem that it is in effect creating on a greater scale.</p>
221	477	Local Resident	James	Trew			EU6		<p>In addition, the policy documentation does not discuss local authorities such as Ealing Council's failure to enforce effective segregation of waste and recyclable material on its part of the Old Oak development zone. If an under-funded local authority cannot manage waste and enforces controls on houses in multiple occupation (HMOs) and organise enforcement on basic requirements of landlords that they must provide waste collection and recycling and social impacts such as fly-tipping, it is highly inappropriate for the Local Plan to advocating development on this scale without fresh thinking on waste management and its control.</p>
221	478	Local Resident	James	Trew			EU6		<p>TITRA is extremely worried that the planned over-development of Old Oak, the lack of emphasis on building up much greater space within buildings for on-site waste collection and the failure to promote far greater recycling rates, will cause very serious problems in waste and recycling storage in Old Oak in the years ahead. TITRA thinks that Policy EU6 is ineffective and unsound.</p>
223	549	Local Resident	Eileen	Hannington			EU6		<p>TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.</p>

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223	562	Local Resident	Eileen	Hannington			EU6		TITRA is also very concerned that despite its focus on high density development and tall buildings, that Policy EU6 is not considering new ways to collect, store and deal with the greatly-increased waste requirement that will generated by such development. In addition, it does not bring forward ways to properly enforce effective waste collection and recycling that will result form over-development of Old Oak. Policy EU6 merely repeats the usual call for: "adequate provision for waste storage and collection within developments, in accordance with the London Waste Recycling Board's (LWARB) guidance on recycling and storage, ensuring: i) source segregation of bio-waste and other recyclables; ii) control of odour, nuisance and air and noise pollution from waste collection; and iii) working with waste authorities to ensure waste collection approaches align with current and future waste collection arrangements..." But policy EU6 undermines its own policy by acknowledging on p177 that "Average recycling rates in inner city areas, particularly in areas with tall buildings, in London are less than 30%." Since the Local Plan is aiming to add at least 22,000 homes into a small district of London, local residents want to see a far more strategic and practical and accountable policy in the Local Plan to deal with a problem that it is in effect creating on a greater scale.
223	563	Local Resident	Eileen	Hannington			EU6		In addition, the policy documentation does not discuss local authorities such as Ealing Council's failure to enforce effective segregation of waste and recyclable material on its part of the Old Oak development zone. If an under-funded local authority cannot manage waste and enforces controls on houses in multiple occupation (HMOs) and organise enforcement on basic requirements of landlords that they must provide waste collection and recycling and social impacts such as fly-tipping, it is highly inappropriate for the Local Plan to advocating development on this scale without fresh thinking on waste management and its control.
223	564	Local Resident	Eileen	Hannington			EU6		TITRA is extremely worried that the planned over-development of Old Oak, the lack of emphasis on building up much greater space within buildings for on-site waste collection and the failure to promote far greater recycling rates, will cause very serious problems in waste and recycling storage in Old Oak in the years ahead. TITRA thinks that Policy EU6 is ineffective and unsound.
47	598	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		EU6		The Council's comments relating to waste are contained in a separate joint response with Lambeth and Wandsworth.
225	634	Local Resident	Marta	Donaghey			EU6		I object to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
25	661	Agent	Neil	Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited	EU6		We welcome the amendment relating to the Quattro site in Acton Wells, which is safeguarded in the West London Waste Plan. Whilst we do not dispute the importance of waste sites (indeed they are an essential element of Quattro's business), it is difficult to see a waste site being compatible with all the other objectives set out for North Acton and Acton Wells. We are in discussion about alternative waste site provision. We will be in touch with the OPDC to discuss this in due course but we would like to place on record that we are actively seeking an alternative site so that our landholding can be comprehensively planned.
227	683	Local Resident	Jamie	Sutcliffe			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
30	789	Local Authority	Steve	Barton	London Borough of Ealing		EU6		Ealing previously made comments on policy EU6 'Waste' in September 2017. Various amendments have been made to this policy following the last consultation, many of which are welcomed, and in part go some way to addressing our earlier concerns. Despite these changes, there remain a number of outstanding and in principle concerns. These comments should be read alongside our earlier comments submitted in September 2017, and our representations to the draft London Plan (submitted March 2018). Whilst the need to safeguard existing and allocated waste sites (as identified through the WLWP), recognising their contribution to the adopted apportionment target as provided for under clause 'a' of policy EU6, is supported, such provisions are in effect already covered through the policies of the West London Waste Plan (WLWP). The WLWP sought to identify sufficient sites at the time to satisfy the then adopted apportionment targets. In December 2017 new apportionment targets were published in the emerging London Plan, which represent a significant uplift on the adopted apportionment figures. A comparison of the figures for 2021 for Ealing alone illustrate the significance of this change, with the revised figure increasing to 543,000 tonnes from 291,000 in the current London Plan (an 86% increase). Against the new and significantly higher targets, insufficient sites are now allocated or safeguarded within the West London Waste Plan, or through OPDCs LocalPlan. Merely safeguarding such sites then through policy EU6 fails to properly grapple with the challenge.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
30	790	Local Authority	Steve	Barton	London Borough of Ealing		EU6		As advised previously Ealing has made representations to the GLA requesting that apportionment targets should be set for all authorities including the MDCs. As currently calculated the revised apportionments have been determined based on the administrative boundaries of the boroughs and not the amended boundaries of the LPAs, and thus the MDCs are not assigned their own apportionment. Despite the transfer of planning responsibilities to the OPDC in April 2015, the land now falling within the OPDC's boundary continues to determine Ealing's percentage share of the apportionment(suitability index). The single biggest factor determining this percentage share is the amount of industrial land, as such areas are deemed to have greatest potential to accommodate waste management facilities. Ealing as a borough accommodates a significant quantum of industrial land, which has resulted in it being assigned the largest apportionment share of all boroughs in London. However, based on designated industrial land (SIL & LSIS), Park Royal comprises the borough's largest single concentration of employment land accounting for 43% of Ealing's supply of designated land. Based on our revised LPA boundaries, which exclude Park Royal, the amount of industrial land is therefore significantly less. We understand that the OPDC have also made representations to the emerging London Plan, which make a case that the OPDC should not be assigned its own apportionment in relation to waste. We do not accept this reasoning. We note that the draft London Plan recognises that the OPDC is a separate entity and separate targets for MDCs have been established, for example, in relation to housing and the management of industrial land, and yet they choose not to do this for waste. Assessing Ealing's capacity by factoring in land in Park Royal is clearly flawed as it puts Ealing Local Planning Authority in an impossible position. Our ability to plan for this apportionment through utilising a significant area of this land to accommodate future waste facilities now no longer exists following the transfer of planmaking powers to the OPDC. The ability to utilise this capacity and to allocate new waste sites in this area now resides solely with the OPDC. To assign this responsibility to Ealing through the apportionment is in our view neither justifiable nor deliverable.
30	791	Local Authority	Steve	Barton	London Borough of Ealing		EU6		It is noted that in the absence of a waste apportionment for MDCs the supporting text of London Plan policy S18 advises that: 'Mayoral Development Corporations should cooperate with Boroughs to ensure that the boroughs' apportionment requirements are met'. Similarly paragraph 6.68 of policy EU6 references this requirement, and paragraph 6.73 acknowledges the OPDC's obligation to assist the host boroughs in meeting their apportionment targets. Whilst we support and welcome the spirit of these statements, and we acknowledge the OPDC's commitment to this goal, accepting a share of the apportionment would represent a more compelling act. Moreover the lack of proper accountability in the form of a target may potentially create tensions and compromise the delivery of the London Plan policy, and this position is entirely avoidable. By itself this text does not represent an acceptable alternative to assigning each authority their respective apportionment which can then be addressed through local policies (i.e. EU6 or potentially a joint waste plan). The draft London Plan policy cannot be implemented in its current form, as by excluding the MDCs from the apportionment calculations, it fails to assign the apportionment to those authorities with the capacity and capability to identify and allocate sites for accommodating waste management facilities. The GLA's approach to assigning the apportionment is fundamentally flawed, informed by (and its delivery contingent on) opportunities which now sit beyond the LPA's control. We believe then that there is a real possibility that the GLA will need to rectify this position in the London Plan, and the consequence of this is that the OPDC Local Plan will either fail to conform with the London Plan, or if adopted ahead of the London Plan, will be out of date shortly thereafter. Retrieving this situation after the plan has been submitted will be difficult. More detailed
30	792	Local Authority	Steve	Barton	London Borough of Ealing		EU6	B)	In respect of compensatory provision clause 'b' now recognises that alternative replacement provision should be made in the OPDC area in the first instance, which is a welcome addition. Despite this, this policy continues to promote a sequential approach, which could ultimately depend on sites beyond OPDC's boundaries, and for which it has no locus. It is also unclear how this would be secured/managed in practice.
30	793	Local Authority	Steve	Barton	London Borough of Ealing		EU6	B)	The text here has been revised to advise that compensatory provision should be sufficient to meet the maximum throughput that the lost site achieved. Previously the plan advised that compensatory provision should be equivalent to the potential throughput which could be achieved on a site. The earlier text in this respect is preferred and necessary. Specifically, for the allocated sites within the waste plan (all of which are existing sites which have been earmarked for intensification), it is crucial that their full potential capacity is safeguarded as this is how their contribution to meeting the apportionment targets has been measured. We would recommend using similar wording to that used in the new London Plan policy S19 – which advises that compensatory provision 'should exceed, the maximum achievable throughput of the site proposed to be lost'. Measuring compensatory provision based on potential throughput is also crucial where sites may have become redundant over the plan period.
30	794	Local Authority	Steve	Barton	London Borough of Ealing		EU6		Moreover to futureproof the plan, and in the event that an allocated site is not an existing waste site, the policy should apply to both existing and allocated waste sites.
30	795	Local Authority	Steve	Barton	London Borough of Ealing		EU6	6.7	The corrections to the map at figure 6.7 are welcome. One existing site is missing from Ealing's area – O C S Group Ltd, Unit 2 and Yard, Sovereign Park. A GIS layer with boundaries for each site including this one will be sent by separate cover.
107	881	Residents Association	Mark	Walker	TITRA		EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates from high-rise buildings, does not then make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for such large-scale development. The OPDC championing of 22,000 / 25,500 homes through high-rise buildings is storing up waste management problems for the future for Old Oak's existing residential areas. Since Ealing Council cannot cope with existing levels of fly-tipping and tenants' failure to recycle among the many HMOs licensed near the Old Oak Conservation Area, we strongly believe that Policy EU6 is unsound.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
107	896	Residents Association	Mark	Walker	TITRA		EU6		TITRA is also very concerned that despite its focus on high density development and tall buildings, that Policy EU6 is not considering new ways to collect, store and deal with the greatly-increased waste requirement that will be generated by such developments. In addition, it does not bring forward ways to properly enforce effective waste collection and recycling that will result from the over-development of Old Oak. Policy EU6 merely repeats the usual call for: "adequate provision for waste storage and collection within developments, in accordance with the London Waste Recycling Board's (LWARB) guidance on recycling and storage, ensuring: i) source segregation of bio-waste and other recyclables; ii) control of odour, nuisance and air and noise pollution from waste collection; and iii) working with waste authorities to ensure waste collection approaches align with current and future waste collection arrangements..." But policy EU6 then undermines its own policy by acknowledging on p177 that "Average recycling rates in inner city areas, particularly in areas with tall buildings, in London are less than 30%." Since the Local Plan is aiming to add at least 22,000 and maybe 25,000 homes into a small district of London, local residents want to see a far more strategic and practical and accountable policy in the Local Plan to deal with a problem that it is in effect creating on a greater scale in the future.
107	897	Residents Association	Mark	Walker	TITRA		EU6		In addition, the policy documentation does not discuss local authorities such as Ealing Council's failure to enforce effective segregation of waste and recyclable material across its part of the Old Oak development zone. If an under-funded local authority cannot manage waste and enforces controls on houses in multiple occupation (HMOs) and organise enforcement on basic requirements of landlords that they must provide waste collection and recycling and social impacts such as fly-tipping, it is highly inappropriate for the Local Plan to advocating development on this scale without fresh thinking on waste management and its control. TITRA is extremely worried that the planned over-development of Old Oak, the lack of emphasis on building up much greater space within buildings for on-site waste collection and the failure to promote far greater recycling rates, will cause very serious problems in waste and recycling storage in Old Oak in the years ahead.
107	898	Residents Association	Mark	Walker	TITRA		EU6		TITRA condemns unreservedly Policy EU6's paragraph 6.73's wish to safeguard and expand the Powerday waste site in stating: "... The Old Oak Sidings (Powerday) site has sufficient capacity and land to meet and exceed LBHF's London Plan apportionment and is therefore safeguarded and protected alongside other sites identified in the WLWP." On these different grounds, TITRA thinks that Policy EU6 is ineffective and unsound.
228	910	Local Resident	Pablo	Navarrete			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
114	921	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		EU6		2.4. We object to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates from high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
95	992	Local Resident	Mark	Walker			EU6	ii)	I think Policy EU6 is unsound. If the OPDC is planning high-density development and high-rise buildings throughout Old Oak and you admit that recycling rates in high rise building are lower than others, so it is will be causing a future waste and recycling problem associated with rented properties on a far greater scale than ever before. Anyone living locally knows that Ealing Council cannot cope in any way with existing levels of fly-tipping and tenants' failure to recycle among the many HMOs licensed near the Old Oak Conservation Area because it has no money and resources for enforcing the rules. So why is the OPDC ignoring these issues? With this misguided and unsound Policy EU6 you are in effect going to make environmental issues faced by existing residential communities in Old Oak far worse.
50.b	1016	Statutory Consultee	Donatella	Cillo	Environmental Agency		EU6		Finally, we think that a more strategic approach to the relocation and re-provision of the European Metal Recycling site is necessary, as this has been allocated for housing. It is one of a few sites that is able to legally dispose certain types of waste and if that facility is not replaced we envisage there being a high risk of increased illegal disposal or flytipping of these materials. This could be on the site or elsewhere in London and the southeast of England. We acknowledge that this is not necessarily for you to resolve in isolation but we encourage you take a collaborative approach and begin discussions with us and relevant stakeholders on this topic in good time.
233	1095	Local Resident	Pendle	Harte			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates from high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
101	1100	Local Resident	Jason	Salkely			EU6		I object to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
56	1224	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6	c)iii Para 6.85	LBHF supports Para 6.85 & point c iii) which states "it will be important to agree the design/sizing of facilities to be provided as well as transfer arrangements with the Waste Authority responsible for collection".
56	1225	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6	c)vii	Energy to waste facilities have an impact on local air quality, care must be taken to ensure that emission from any of these proposed facilities does not result in the exceedances of the WHO health based air quality standards. Development proposals for these type of facilities should only be supported in agreement in writing with the Local Authority where they do not result in the deterioration in local air quality and make a positive contribution to overall improvement in air quality. Amend point (c) (vii) of Policy EU6 as follows:- "vi) does not result in the deterioration in local air quality, minimise CO2 emissions and where relevant, increase operational capacity and waste recovery rates";

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1226	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6	Para 6.73	LBHF supports Para 6.73 which states that "OPDC will continue to work positively with the host boroughs to help demonstrate how any new London Plan apportionment targets would be met..."
56	1227	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6	Para 6.75	See comments on Policy EU6 above. Amend Para 6.75 as follows:- "To support decentralised energy provision and bio-waste treatment, OPDC will support the development of proposals that bring forward innovative solutions for energy generation in agreement with the Local Authority (s) where they do not result in the deterioration in local air quality and where they meet the London Plan carbon intensity floor emissions performance standards (400g/kWh electricity produced at the time of the publication of this Local Plan)".
56	1228	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6	Para 6.76	Amend Para 6.76 as follows:- "...OPDC will work with the operators of the waste sites and other relevant stakeholders such as the Environment Agency, the waste authorities, local authorities, businesses, and residents to find ways to introduce energy generation in a way where they do not result in the deterioration in local air quality and that delivers benefits and addresses adverse impacts to the area."
56	1229	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6	Para 6.78	Amend Para 6.78 as follows:- "Where applications propose new or enhanced facilities these will only be supported in agreement with the Local Authority (s) where they do not result in the deterioration in local air quality and where the development can demonstrate that it will not adversely impact on the surrounding environment..."
56	1230	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6	Para 6.87	In terms of innovative waste collection facilities, LBHF wish to be involved in future discussions on options for waste collection systems as part of new major developments proposals.
56	1231	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU6		Although LBHF does not currently operate a food waste collection service, this should indeed be considered in all aspects of the development including provision of the appropriate storage space. Its likely that LBHF will have food waste collection in operation over the OPDC Local Plan period. LBHF wish to be involved in any future SPD guidance being prepared on waste management as this should be consistent with LBHF standards/requirements.
234	1299	Local Resident	Elaine	Gristock			EU6		Policy EU6 on waste is completely lacking in strong proposals. There is nothing there to raise the standard on typical high-rise waste collection/recycling facilities. There is nothing to reassure us that the OPDC intends to enforce the processes that will be necessary to stop the area degenerating further. We have huge problems NOW and a horrifying lack of local council support in combating those problems. Your proposition for more than 22,000 additional high-rise homes will have a seriously negative impact on our area.
103	1337	Local Resident	David	Turner			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.
89	1343	Local Resident	Nicky	Guymer			EU6		I object to the latest OPDC plans as outlined in the points below, in line with and in support of my local resident's association, TITRA. I particularly object to the keeping of and expanding of Powerday. They have been a blight on our daily lives for years through an almost continual stench and an 'unexplained' plague of flies. Their mishandling of asbestos remains a concern as to the hidden risks they have been to us as a community. I would like to see the OPDC remove Powerday from their plans entirely.
89	1347	Local Resident	Nicky	Guymer			EU6		TITRA objects to Policy EU6 on waste which, in the same breath as acknowledging the lower recycling rates seen in cities' high-rise buildings, does not make extra provision for more effective on-site waste collection, collection of material for recycling and enforcement mechanisms for these buildings. The OPDC championing of 22,000 homes high-rise is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
238	1593	Local Authority (Waste)	Jonathan	Wade	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington & Chelsea		EU6		<p>In January 2017, the Western Riverside waste planning authorities of Lambeth, Kensington & Chelsea, Hammersmith & Fulham, Wandsworth and the Old Oak and Park Royal Development Corporation (OPDC) prepared a joint waste technical paper (WTP). The purpose of this was to provide an up to date evidence base to support waste planning. The WTP identifies existing waste capacity for meeting apportioned waste and other types of waste, forecasts waste needs to 2036 and identified the capacity gap for all waste streams. The WTP also identified waste imports and exports and those waste planning authorities receiving waste from the Western Riverside area. In May 2017 the Western Riverside WPAs wrote to 38 authorities who receive significant waste exports from the area asking a number of questions about the continuation of these waste flows.</p> <p>Lambeth, along with Kensington & Chelsea and Wandsworth, aimed to plan for waste jointly across the Western Riverside area by pooling capacity and apportionment targets. National and regional policy both encourage joint working on waste. Specifically, the National Planning Policy for Waste states "waste planning authorities should [...] work collaboratively in groups with other waste planning authorities [...] to provide a network of facilities to deliver sustainable waste management" (NPPW 3); the London Plan says "Boroughs may wish to collaborate by pooling their apportionment requirements (Policy 5.17F).</p> <p>At a meeting in January 2017, officers of the Western Riverside WPAs agreed to "pool apportionments, arisings and available capacity for all waste streams". The WPAs sought to formalise this agreement through a Memorandum of Understanding (MoU) and in subsequent meetings of the Western Riverside WPAs to discuss the MoU, Lambeth, Kensington & Chelsea and Wandsworth's have continued to voice their aspiration to pool capacity and apportionment targets and to plan for waste collectively across the Western Riverside area. At the same time, Hammersmith & Fulham and the OPDC have resisted planning for waste collectively.</p> <p>In March 2018, during the examination on Kensington & Chelsea's Local Plan, LB Hammersmith & Fulham and the OPDC wrote to RBK&C to say that as a result of the increased apportionment targets for OPDC's host boroughs of Ealing and Brent, further work is needed to establish if they can meet their apportionment targets in their own areas. Therefore LBH&F and OPDC have said they are unable to commit to pooling with the Western Riverside WPAs until this work has been completed. We have not received any update on this work to date and look forward to a progress report in response to this representation.</p>
238	1594	Local Authority (Waste)	Jonathan	Wade	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington & Chelsea		EU6		<p>The London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington & Chelsea provided a joint response on the first revised draft Local Plan in September 2017.</p> <p>In that response we drew your attention to previous Western Riverside joint working (summarised above) and to national and regional policy support for joint working on waste planning. We noted that planning for waste management is a strategic (crossborough) matter and subject to the legal requirement of the Duty to Cooperate. We then pointed out that OPDC's strategy for waste is an impediment to joint waste planning across the Western Riverside area.</p> <p>We are surprised that there has been no contact from OPDC about these comments since they were made.</p>
238	1596	Local Authority (Waste)	Jonathan	Wade	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington & Chelsea		EU6		<p>While the OPDC Local Plan is likely to be examined against the London Plan 2016, it is worth noting the direction of travel in the draft new London Plan waste policies. Supporting text in para 9.8.7 acknowledges that it may not be possible for boroughs to meet their apportionment and they will need to agree the "transfer of apportioned waste". The same paragraph directs Mayoral Development Corporations like the OPDC to "cooperate with boroughs to ensure that the boroughs' apportionment requirements are met. This could be widened to cover boroughs in the relevant waste disposal authority". In addition, paragraph 9.8.7 says that "Waste plans should be responsive to strategic opportunities across borough and joint waste planning boundaries for optimising capacity on existing waste sites [...]".</p> <p>Early suggested changes on the draft new London Plan are expected in August and we hope the responsibility of MDCs to work collaboratively in groups with other waste planning authorities is clarified.</p>
240	1600	Local Resident	Allesia	Stevani			EU6		<p>I am writing to object to Powerday expanding or increasing its recycling operations.</p> <p>Has there been a change of management there? After over 10 years of regular complaints from residents and EA visits, only a new board would dare ask to expand.</p> <p>As we know from experience new chief execs / managers like to write off history and do not take any responsibility for their predecessors' promises or actions. They are usually only interested in lining their own pockets with gold at the expense of others.</p> <p>Powerday does not infuse the air with the smell of flowers or sweet biscuits. It infuses the air with the stench of rotten food. No matter how many attempts to close internal doors and other precautions, the smell still escapes and prevents nearby residents from going in the garden or opening the windows. It will never change, because Powerday is in the wrong place.</p> <p>I urge you to curb their operations - not increase them and to decline any Planning permission in this regard.</p>

Policy EU7: Circular and Sharing Economy

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	211	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	EU7		<p>Whilst we acknowledge and share OPDC's aspirations in this regard, we continue to believe that this policy has the potential to be particularly onerous, requiring the submission of information which goes well beyond the planning application stage to include the supply chain, end users and even potential future owners. It is at a scale that is appropriate for Building Regulations and national policy, but is not, we feel, appropriate to be introduced into the OPDC Local Plan where it is not a requirement for other development in London. Such onerous requirements will place further limitations on development at Old Oak, which as an Opportunity Area already has a significant challenge compared to development in established parts of London where it has to fund significant infrastructure costs whilst having greater uncertainty and risk on values. To introduce requirements that further constrain elements such as commercial lease arrangement and construction procurement routes is unnecessary and overly burdensome, and we would request sustainability policies which are proportionate and appropriate when viewed alongside parallel control regimes.</p>
50.b	1015	Statutory Consultee	Donatella	Cillo	Environmental Agency		EU7		<p>We support your approach to the circular economy and the drive for waste minimisation which if implemented, should help with these issues.</p>

Policy EU8: Sustainable Materials

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1232	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU8		Policy is supported.

Policy EU9: Minimising Carbon Emissions and Overheating

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1233	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU9		We are concerned about the local air quality impacts that on-site energy generation in major developments could have where combustion is involved. This potential impact of systems that may be low carbon needs to be considered. The Policy should include reference to the need to minimise the local air quality impacts of energy generation and note that where unacceptable air quality impacts cannot be avoided or mitigated that alternative energy generation options should be implemented.
56	1234	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU9		It is noted that the Policy requires major developments to demonstrate that they are achieving the calculated CO2 reduction targets. It is unclear what timeframe is envisaged for this requirement. Does it cover the whole lifetime of the development? It might be quite feasible for a building to vary in its CO2 emissions from year to year due to a number of factors (e.g. weather, occupant behaviour etc). Clarification should be provided on the timeframes envisaged for monitoring of CO2 emissions.
56	1235	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU9		It is unclear what the intended actions are for a development that shows that CO2 emissions are consistently higher than required. Does this need to be covered in the Policy and Supporting Text? Clarify if there are any actions that would be taken if a development is not meeting the required CO2 emissions targets.
56	1236	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU9	Para 6.100	Support the development of guidance on the carbon offset scheme to be implemented in the OPDC area.
110.b	1517	Community Group	Robin	Brown	Grand Union Alliance		EU9		EU9 a) iii: Support in principle is expressed for district heating and cooling systems and the exploitation of heat pump potential from sewers or aquifers. But funding may well be problematical and in the case of North Acton, whilst an appropriate candidate, the local authority failed to require it.
110.b	1518	Community Group	Robin	Brown	Grand Union Alliance		EU9		EU9 a) iv: Planning and Architecture seem not to evaluate 'what actually works and what does not', and therefore Post Occupancy Evaluations are welcomed. As for these evaluations, their scope should be extended to include not only monitoring the performance of buildings and their environmental services, but also the associated landscaping and publicly accessible realm.
110.b	1519	Community Group	Robin	Brown	Grand Union Alliance		EU9	6.97	Para 6.97: The expectations set by the Mayor and the OPDC may not be met. The inevitable result of pursuing such a high density high build in Old Oak, North Acton, Scrubs Lane etc. is that compromises or trade-offs will be needed between the different elements that contribute to overall environmental performance. For example, tall and high buildings can overshadow roof top/building elevation mounted solar panels diminishing their utility and performance. Consequently, the promised (see SP9) high levels of sustainable design, construction and operation will not materialise.

Policy EU10: Energy Systems

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
17.b	275	Strategic Partner	Debbie	Fifer	Canal & River Trust		EU10		We note that a new paragraph has been inserted referring to cooling in non-residential buildings. The Trust has previously commented in respect of Policy EU9 about the potential for the Grand Union Canal to play a role in cooling new developments reference to which could be included within policy EU10.
56	1237	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU10		As for Policy EU9, we are concerned about the local air quality impacts that on-site energy generation in major developments could have where combustion is involved. This potential impact of systems that may be low carbon needs to be considered. As for Policy EU9, consideration should be given to recognising that some energy generating technologies can give rise to emissions of concern in terms of their impacts on local air quality and that where a proposed system is considered to have an unacceptable impact in this respect, alternative energy systems should be used.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1238	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU10	c)	<p>After road transport, buildings are the second largest source of air pollution in London, emitting 44% of the total Nitrogen Oxides in London, or about 2,950t/yr. Buildings are also the second largest anthropogenic source of Particulates after road transport, contributing 18% of London emissions through gas heating, large boilers, and Industrial plant. Building emissions arise primarily from combustion to provide space and water heating and some industrial processes. Domestic sources, primarily water heating gas boiler exhausts, are distributed over wide areas, diluting their pollution.</p> <p>While commercial heating plant emissions can be intense, these are required to have tall chimneys and special abatement equipment, to minimise concentrations downwind and the chances of a plume reaching the ground. Thus, buildings do not tend to create pollution exceedance hotspots, but contribute substantially to the urban background pollution concentrations.</p> <p>Amend point (c) of Policy EU10 as follows:-</p> <p>“c) support and contribute to/and deliver low carbon cooling networks and Zero Emission networks where feasible and appropriate. Development should prioritise connecting to strategic area wide district cooling networks when and where cooling is required and where these networks are available and contribute to reducing energy and CO2, NO2, NOX, PM2.5 and PM10 emissions. Where a network is not available, provide on-site cooling solutions and future proof the development so that it can connect into a low carbon zero emission district cooling network if it becomes available”;</p>
56	1239	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU10	Para 6.110	<p>See comments on Policy EU6 above.</p> <p>Amend Para 6.110 as follows:-</p> <p>“In respect of heat, OPDC’s preferred approach is to develop a strategically planned decentralised heat network that does not result in the deterioration in local air quality. In accordance with the new draft London Plan, secondary heat sources for decentralised networks should be prioritised...”</p>
56	1240	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU10	Para 6.112-6.113	<p>Para 6.112 – 6.113 discuss the proposed strategic approach to establishing a heat network and associated energy centres. If the OPDC have an indicative layout of the network in mind and know where energy centres would be most efficiently located, this would be useful to include in the Local Plan. Consider including details or plan of indicative heat network and energy centre locations.</p>

Policy EU11: Smart Technology

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	212	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	EU11		<p>We still question the appropriateness of including a policy relating to technology in the Local Plan. It is not the responsibility of the planning system to govern broadband speeds, or set planning policies relating to the protection of data, protocols and data management systems. Whilst we support the aspirations, we consider that this is a function that can be provided by the OPDC outside of the development plan. Its inclusion in the plan adds further cost and burden to the planning process, and generally to the cost of development in the Opportunity Area.</p>

Policy EU12: Extraction of Materials

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1241	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU12	f)	<p>We have expressed concerns about the inclusion of this Policy before. Although the Policy sets out the scenarios under which applications for mineral extraction would be supported, these are restricted by a number of control measures that would be required to protect the environment etc. It is noted that bullet point (f) deals with provision of controls to mitigate greenhouse gas emissions and dust during construction and operation, but does not refer to other emissions. It is recommended that bullet point (f) needs to also include reference to NOx emissions</p>

Policy EU13: Land Contamination

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1242	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		EU13		<p>Previous suggested changes have been retained including paragraph 6.131 which states: local authorities hold the specific responsibility for the management of land contamination within their boundary under Part 2A of the Environmental Protection Act 1990 and will have to agree in writing any proposed submissions or actions with regard to the assessment or remediation of land contamination. After remediation under planning, as a minimum, land should not be capable of being determined as contaminated land as defined by Part 2A of the Environmental Protection Act 1990 by the relevant local authority.</p> <p>We are therefore satisfied that no further changes are necessary.</p>

Chapter 7. Transport

General/Introduction

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	39	Planning Consultant	Ashley	Collins	JLL	Imperial College			Imperial College London wishes to lend its support to the range of walking, cycling, bus and rail policies within this chapter and in particular the desire to improve existing connections and enhance permeability. This is particularly important for Imperial College London in respect of the southern links to White City, so that the two areas can have a mutually beneficial effect upon one another.
90	146	Local Resident	John	Cox				7.2	7.2: The density and arrangement of cycling provision is inadequate, with too coarse a network to achieve the Mayor's target and the desired modal shift. It has an over-reliance on existing highways, where road space is at a premium, competed for by through-traffic, delivery vehicle movements, parking, and in cases like Coronation Road, on-road car-servicing work. It is difficult to envisage that these conditions in intensively-used areas of Park Royal and elsewhere will change to the degree that cycling will achieve a critical mass of routine cycling trips without more appropriate measures.
28	749	Strategic Partner	Lucinda	Turner	Transport for London		Introduction	7.2	TfL welcomes the additional references to the Mayor's mode share targets, the need to manage construction transport and support for sustainable freight and servicing
110.b	1520	Community Group	Robin	Brown	Grand Union Alliance			7.2	7.2: The density and arrangement of cycling provision is inadequate, too coarse a network, to achieve the Mayor's target and the desired modal shift. It has an over reliance on existing highways where road space is at a premium competed for by parking, servicing and vehicle movements, for example, Coronation Road. It is difficult to envisage that these conditions in the intensively used areas of Park Royal and elsewhere will change to the degree that cycling will achieve a critical mass of trips without more appropriate measures.

Policy T1: Roads and Streets

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
90	147	Local Resident	John	Cox			T1	f) g)	Policy T1 f): Add to policy: "by design features and signage". The maximum speed of 20 mph is best encouraged and achieved by the geometry of roads, including deliberate bends, even on bus routes. For example, the existing 'kink' in Hythe Road should not be designed out. Curve all roads. Add some new kinks.
99	622	Residents Association	John	Haston	West Twyford Residents Association		T1		4. Development Proposals d) ensures all new streets are built and designed in accordance with TfL and Local Highway Authority Guidelines Transport systems require space but as stated in the Introduction para 7.3, Reg 19 (2) – "does not deal with the special aspects of Transport requirements....". Environmentally friendly safe streets require space. For the amount of time OPDC have been planning we should have, cross sections through "typical" roads showing likely – carriageways widths including bus lanes , loading bays, car parking / waiting bays (if applicable)with charging points, planting areas, cycle lanes, walking areas, seating areas, street lighting and signage and underground services zones. OPDC should be starting to superimpose roads on drawings / maps showing clearly their overall width and where they interface with existing features that are to be retained, thus leaving the plot areas to be developed. The plot areas themselves can also have road systems - on large plots. Artists can draw street scenes but they have to be realistic and show the public transport that will replace the car. It is also noted that a lot of photo examples and artist renditions of places have been replaced with generic ideas not specifically addressing OPDC places. We would point out that HS2 proceeded on sketch information for the overland route from Old Oak to Northolt section, thinking that only certain bridges needed heightening when in fact "all" bridges on the route needed heightening - hence we now have a tunnel construction through to Northolt.
28	750	Strategic Partner	Lucinda	Turner	Transport for London		T1	Policy part c and d and 7.9	TfL is pleased to note the requirement that streets should be built and designed to adoptable standards and in accordance with TfL and local highway authority guidance. However, it is important that appropriate contractual rights of way and clarity on management and maintenance are established from the outset for all routes and connections (including cycle and pedestrian routes) to ensure that access is not compromised and Healthy Streets principles can be delivered. This is particularly important because of the long build out period for many of the sites and the exclusion of vehicles from certain routes. This point could either be clarified in the text or by defining streets as any route or connection, not just vehicle routes.
28	751	Strategic Partner	Lucinda	Turner	Transport for London		T1	Policy part e	TfL suggests that this should read 'minimise and mitigate the impact...'
28	752	Strategic Partner	Lucinda	Turner	Transport for London		T1	7.7	TfL welcomes references to the Healthy Streets Check for Designers tool and the TfL Streets Toolkit
56	1160	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1		As the local highways authority, this should be compatible with LBHF's highways requirements and Streetsmart guidance. We request that Streetsmart is referenced within this paragraph. (D2, para 5.14) Streetsmart is to be used boroughwide including within the Old Oak area and as the Highways Authority for the majority of new roads within the Old Oak area, we would insist that Streetsmart is used. Insert reference to Streetsmart within Para 5.14.
56	1243	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1		As the Highways Authority, LBHF request greater recognition and involvement in the OPDC regeneration project as a whole, including the development of transport networks within the OPDC area and connections to the wider area.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1244	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1		There is no specific policy in place to secure funding for the future maintenance of new public highways through the planning process. This is essential and needs to be considered further. LBHF notes a Planning Obligations SPD is programmed for consultation In November 2018 which may contain further detail on maintenance. The SPD should include reference to mechanisms for securing funding for maintenance of infrastructure including roads. As the Highways Authority, LBHF request to be involved in the preparation of this document ahead of public consultation to ensure it aligns with LBHF policies for securing planning obligations.
56	1245	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1		Although the Local Plan states LBHF will adopt the roads once delivered, there is no road adoption strategy in place and agreed between LBHF/OPDC/TfL. LBHF request an adoption strategy is prepared and agreed between LBHF/OPDC/TfL. Include reference to the need for this to be prepared in the Local Plan.
56	1246	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1		It is noted that this chapter does not appear to mention sustainable drainage. Although drainage is not in itself a transport matter, provision of transport infrastructure is necessarily referenced in this chapter and omission of this design element seems unwise. Make reference to SuD's and Policy EU3 within the transport Chapter (Policy T1 may be the most appropriate place).
56	1247	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1		The Policy Links should include reference to Policy EU4 - Air Quality and the Evidence Base links should include reference to the Air Quality Study (AQS). Add reference to Policy EU4 under "Policy Links" and add the Air Quality Study under "Evidence Base Links". The same applies for Policies T2, T3, T4, T5, T6 & T7.
56	1248	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1	f)	Although the policy box (f) states 20 mph on all new and existing roads where appropriate, the text in para 7.9 then states that 20 mph should be on all existing roads apart from the A40 and the A406. Firstly, this it is a matter for the local highway and traffic authority to determine this not the OPDC. Secondly, it is contrary to the current LBHF view that A roads outside of town centres should be 30 mph, e.g. Scrubs Lane.
56	1249	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T1	Para 7.9	Para 7.9 states that "All new and improved roads must be built to adoptable standards and any decision to adopt streets will need to be made in collaboration with relevant highway authorities." This seems very wishy-washy. LBHF consider the OPDC need to agree a strategy with the "relevant highway authorities" so that any adoption can be secured via the planning process. Along with provision for their long term maintenance via a commuted payment arrangement which would need to be secured at planning approval stage.
110.b	1521	Community Group	Robin	Brown	Grand Union Alliance		T1		Policy T1 f): add to policy "by design features and signage". The maximum speed of 20 mph is best encouraged and achieved by the geometry of roads, including deliberate bends, even on bus routes. For example, the existing 'kink' in Hythe Road should not be designed out.

Policy T2: Walking

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
28	753	Strategic Partner	Lucinda	Turner	Transport for London		T2	Figure 7.5	TfL welcomes changes and additions to the map in response to previous comments
119	858	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		T2	Fig. 7.5	Shows existing Quietway in the wrong place Correct line of existing Quietway
56	1250	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T2	Para 7.18	LBHF use Legible London wayfinding measures primarily in town centres and would not support their use "throughout the [OPDC] area". Their proliferation in residential areas is unnecessary and would be a burden to the Council's revenue account.

Policy T3: Cycling

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
90	148	Local Resident	John	Cox			T3	c)	Policy T3 c): add to policy: "ensure that new cycle networks, including a presumption of new segregated cycling lanes along all reconstructed main roads, connect into and support the wider, existing cycle network, National Cycle route 6 and the future cycle superhighway route to Wood Lane".
90	149	Local Resident	John	Cox			T3	7.21	7.21: Add at the end: "In order for such cycling access to deliver on permeability and the Mayor's targets, segregated cycling lanes should be provided along existing roads that are reconstructed, in particular, Old Oak Common Lane and the main western entrance to Old Oak Common Station (HS2/GWML etc.)."
19.b	496	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		T3		The canal corridor runs east-west through the entire length of the OPDC area, connecting densely populated residential areas and areas of employment. Even in its present, unimproved condition, the narrow towpath on the southern side of the canal is widely used as a pedestrian and cycling route. From observed patterns of use, it is clear the towpath is used as a commuting route, particularly for cyclists. In its present condition as a narrow, shared strip this undoubtedly causes friction between pedestrians and cyclists and represents both a constraint to use and a safety risk. The expected increase in both resident and employed population due to the development of OPDC and the wider west London sub-region means the demand placed on the canal corridor can be expected to increase substantially over time. In the case of Park Royal, Policy T3: Cycling confirms the vast majority of the area's current employees live within 8km. and a significant concentration within 5km or less.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
19.b	497	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		T3		The revised Local Plan shows the canal corridor as the main continuous east-west walking and cycling route through the OPDC area, from Alperton in the west towards Central London in the east. Figure 7.7: Indicative Future Cycle Network shows a proposed Cycle Superhighway running east-west along the A40. However, this is mainly outside the OPDC area, crossing only the south-western corner of Park Royal and well to the south of Old Oak.
19.b	498	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		T3		We welcome the intention to create a new, segregated cycling route along the south side of the canal through both Old Oak and Park Royal, but note with concern the caveat placed against this, i.e. that its delivery will take place "where feasible and appropriate" (see Infrastructure Delivery Plan, PRN ref TP24). Elsewhere in the Local Plan the improvements to the southern side of the canal are stated to include delivery of a segregated cycling route "where feasible, and where not, a shared walking and cycling route" (Policy P3: Grand Union Canal).
19.b	499	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		T3		We also welcome the proposed walking and cycling route along the north side of the canal in Old Oak and "improvements" to the towpath on the south side of the canal in both Old Oak and Park Royal. When supported by a segregated cycling route, these latter improvements should enhance access for pedestrians to and along the canal corridor as well as enhancing the waterway for other uses such as boating and angling.
19.b	500	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		T3		The Local Plan includes an image presumably intended to convey an impression of an acceptable standard of cycling and walking route (Figure 7.6: Cycle Tunnel, Amsterdam). The image shows a wide, bi-directional segregated cycle route running parallel to a broad pedestrian route. We appreciate there are significant challenges to providing this standard of cycling and walking route through the OPDC area, but the reality of an "improved towpath", with commuting cyclists and pedestrians using a narrow shared space is very far removed from this image and should be considered insufficient for future demand and inherently unsafe.
19.b	507	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		T3		Faced with the scale of new development and with the objective of promoting use of the canal corridor, we urge OPDC to make a firm commitment to the following: <ul style="list-style-type: none"> • Cycling - a segregated, continuous, bi-directional cycling route of high quality design and construction, through the full length of the canal corridor; • Pedestrians – ensure the pedestrian route along the canal corridor is completely separate to the cycling route, of high quality design and construction, safe, attractive and easy to navigate; • Other users – ensure there is sufficient space for boaters, anglers and others to safely and enjoyably use the canal.
99	623	Residents Association	John	Haston	West Twyford Residents Association		T3		5. Development proposals will be supported where they C) ensure that new cycle networks connect into and support the wider existing cycle network, such as.... .Why has the Grand Union Canal been deleted from the list?
99	624	Residents Association	John	Haston	West Twyford Residents Association		T3	Para 7.27	6. 7.27 A future extension of Cycle Hire into Old Oak and Park Royal would represent a logical expansion So why has second last sentence in this para "OPDC will also work with TfL to enhance the network in this area." been deleted?
28	699	Strategic Partner	Lucinda	Turner	Transport for London		T3		TfL supports the requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the draft new London Plan.
28	754	Strategic Partner	Lucinda	Turner	Transport for London		T3	Policy part b and g	TfL supports the requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the London Plan including revisions in the draft new London Plan. There is potential for a high cycle mode share to be achieved in the OPDC area and it is important that from the outset this is supported by a generous provision of well designed cycle parking that goes beyond minimum standards and anticipates future increases in demand
28	755	Strategic Partner	Lucinda	Turner	Transport for London		T3	Policy part e and g and 7.21	TfL requests that the policy and supporting text should specifically refer to and give greater emphasis to the importance of provide adequate cycle parking capacity and high quality facilities at new and existing stations
28	756	Strategic Partner	Lucinda	Turner	Transport for London		T3	Policy part h	To ensure that any independent cycle hire operations are complementary to TfL Cycle Hire, the wording should be amended to: 'deliver and/or contribute towards the provision of cycle hire across Old Oak and Park Royal which may include complementary local cycle hire operations'
28	757	Strategic Partner	Lucinda	Turner	Transport for London		T3	Figure 7.7	TfL welcomes changes and additions to the map in response to previous comments
56	1251	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T3	Para 7.26	Para 7.26 states that OPDC will seek to exceed cycle London Plan cycle standards. What cycle standards are they therefore proposing?
56	1252	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T3		The emergence of dockless bikes is supported by the council in order to improve accessibility, public health and modal shift. However, operating companies will be required to enter into a user agreements with the Highway Authority. Reference to dockless bikes should be included within the text of Policy T3 on cycling which states the requirement for operators to enter into an agreement with the Highways Authority.
110.b	1522	Community Group	Robin	Brown	Grand Union Alliance		T3		Policy T3 c): add to policy "ensure that new cycle networks, including a presumption of new segregated cycling lanes along all reconstructed main roads, connect into and support the wider, existing cycle network, National Cycle route 6 and the future cycle superhighway route to Wood Lane".
110.b	1523	Community Group	Robin	Brown	Grand Union Alliance		T3	7.21	7.21: [see also comment on 7.2] add to text "OPDC will support the delivery of a comprehensive cycle network that improves cycle permeability throughout the OPDC area. OPDC will seek to enhance cycling access to and near all rail stations where there should be significant provision for high quality cycling infrastructure." In order for such cycling access to deliver on permeability and the Mayor's target, segregated cycling lanes should be provided along those roads that are to be reconstructed as well as elsewhere as appropriate; in particular, Old Oak Common Lane and the main western entrance to Old Oak Common Station (HS2/GWML etc.).

Policy T4: Parking

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
90	150	Local Resident	John	Cox			T4		Referring to my Reg 19(1) comment 1814 on Park Royal SIL, and assuming I didn't made the point clearly last time, I want to emphasise the difference between Park Royal business owners and senior staff commuting there by car and parking on their own land ('BAD'), and customers and delivery drivers being able to park for short periods (say, up to 30 minutes) during the day ('GOOD'[ish]). The former leads to choking levels of road congestion in peak hours, plus unsightly and unproductive use of land. The latter maintains the necessary vibrant level of economic activity.
90	151	Local Resident	John	Cox			T4		The Local Plan should mandate intensification of Park Royal land use to default to no new day-long car parking and removal of existing provision where possible.
90	152	Local Resident	John	Cox			T4		To encourage public transport by Park Royal daytime visitors, low- or no-car commercial intensification should be encouraged around the Brewery (Park Royal station) cluster, the Harlesden station cluster (proposed) and Stonebridge Park cluster (proposed).
113	411	Local Resident	Thomas	Dyton	WHRRRA (Member)		T4		Although we see benefits in reducing pollution from cars, there is also a concern about the continued unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled, people with children and visiting carers who are reliant on cars. We would ask that programmes are introduced to encourage the use of good value electric cars.
19.b	501	Local Resident	Roger	Still	The Inland Waterways Association - Middlesex Branch		T4		OPDC intends to ensure a modal shift towards more sustainable means of transport and become an exemplar of low carbon development. The measures set out in the Local Plan aimed at meeting these objectives include a restraint-based approach to the provision of parking spaces (one space per five residential units); a requirement for car-free development in certain cases and preventing new residents from applying for parking permits. Whilst these measures are likely to be effective in encouraging the use of public transport, cycling and walking, they also emphasise the need for investment in suitable infrastructure to meet future demand, including increased capacity along the canal corridor for cyclists, pedestrians, boaters and other canal users.
93	529	Residents Association			Wells House Road Residents Association		T4		Although we see benefits in reducing pollution from cars, there is also a concern about the continued unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled, people with children and visiting carers who are reliant on cars. We would ask that programmes are introduced to encourage the use of good value electric cars.
99	625	Residents Association	John	Haston	West Twyford Residents Association		T4	Para 7.35	7. 7.35 'It will be important to carefully manage onward journeys from stations to encourage walking, cycling or use of the bus network.' The additional wording which includes the coach, taxi and PHV market, is a welcome addition, but should state coaches can be large double decker vehicles and any design should accommodate that size. At the HS2 station there will also be a need for coach's 'short term / waiting parking', as well as 'coach stands' for scheduled coaches unlike local bus 'stops' en-route via HS2 station. Note : HS2 plans show no interface works beyond their station frontage and the space to the front of the station is 'under development' according to their scaled route plans.
28	698	Strategic Partner	Lucinda	Turner	Transport for London		T4		TfL supports the overall approach of limiting car parking and encouraging car free development. TfL also supports the requirement for 80% passive provision for electric car parking spaces as well as 20% active provision.
28	758	Strategic Partner	Lucinda	Turner	Transport for London		T4	Policy part a and 7.30	TfL supports the overall approach of limiting car parking, encouraging car free residential development and requiring car free non residential development. Car free development should be the presumption as outlined in the draft new London Plan.
28	759	Strategic Partner	Lucinda	Turner	Transport for London		T4	Policy part a and 7.30	TfL welcomes the reference to requirements for submission of Parking Design and Management Plans as set out in the draft new London Plan
28	760	Strategic Partner	Lucinda	Turner	Transport for London		T4	Policy part c	TfL supports OPDC's policy to promote 80% passive provision for electric car parking spaces as well as 20% active provision which is now a requirement of the draft new London Plan.
28	761	Strategic Partner	Lucinda	Turner	Transport for London		T4	Policy part c	TfL also welcomes the caveat 'where appropriate' when referring to car club provision because it is more relevant in areas with lower PTALs where car use may be more necessary.
28	762	Strategic Partner	Lucinda	Turner	Transport for London		T4	7.34	TfL welcomes the additional text which confirms that OPDC will work with TfL Taxi and Private Hire and other commercial operators such as car clubs as well as exploring options for rapid electric vehicle charging for freight vehicles
28	763	Strategic Partner	Lucinda	Turner	Transport for London		T4	7.35	TfL welcomes the additional text that confirms how coach, taxi and PHV facilities will be provided
56	1253	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T4		Criteria (a) point (i) states "a maximum of 0.2 spaces per residential unit". This seems at variance to the draft London Plan which for PTAL 4 – 6 currently states "car free". There is a need for qualification of where "a maximum of 0.2 spaces per residential unit" is applicable and "strongly encouraging car-free development for residential developments located in areas with PTAL between 4 and 6B" is very different from requiring this. Change "strongly encouraging" to "require" as follows:- ii) Requiring care free development for residential developments located in areas with PTAL between 4-6B
56	1254	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T4		Criteria (c) point (i) proposes 20% active and 80% passive electric charging points". This seems to be at variance to LBHF Local Plan Policy T4 which references 25% provision (albeit that the LBHF Planning Guidance SPD (2018) also references 20%).

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1255	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T4		<p>The health damage costs are most acute in urban environments, particularly in densely populated cities. The lifetime costs are much higher for diesel cars and vans in inner London at £16,424 and £24,555 respectively. They are much lower for battery electric cars and vans at £827 and £1,443. The health costs of battery electric cars and vans are respectively 9 and 17 times lower than for their fossil fuel equivalents, on average.</p> <p>For further information please see figure 5 of the Clean Air Day Report- "The Health Cost of Air Pollution from Cars & Vans"- https://www.cleanairday.org.uk/Handlers/Download.ashx?IDMF=7eb71636-7d06-49cf-bb3e-76f105e2c631</p> <p>Suggested changes to text:</p> <p>"c) When providing car parking, proposals should:</p> <p>ii) include appropriate provision for Zero tailpipe Emission car club vehicles</p> <p>d) Proposals should provide suitable facilities to cater for anticipated demand for coaches and Zero Emission taxis;"</p>
56	1256	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T4	Para 7.32	<p>See council response for T4 above</p> <p>Amend Para 7.32 as follows:-</p> <p>"A network of Zero tailpipe Emission car club bays spread across the site will provide a convenient, cost-effective and attractive alternative to owning a private car and will support the optimal use of space (see Policy EU7). Car club bays will need to be designed into the new development areas from the outset. The Zero tailpipe Emission Car club bays should be designed in such a way that they can be adapted for different uses in the future."</p>
56	1257	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T4	Para 7.34	<p>See council response for T4 above</p> <p>Amend Para 7.34 as follows:-</p> <p>"To encourage the uptake of zero tailpipe emission vehicles and ensure that the Old Oak and Park Royal area is an exemplar of low carbon development..."</p>

Policy T5: Rail

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
208	91	Local Resident	Chris	Bell			T5		<p>I am generally in favour of two additional stations around Old Oak, but not as in the current proposals which in my opinion would be too close to Willesden Junction High Level. Two new stations would provide easier access to Crossrail. However it is proposed to site a station below ground level close to the Crossrail station for HS2, and there is an agreed requirement for a link between HS1 and HS2. This would make access from as many "local" routes as possible to the Crossrail / HS2 / HS1 stations absolutely vital. I was told that the first proposal for the HS1 - HS2 link was just a quick relatively inexpensive suggestion, and it was only rejected as "not fit for purpose". There is no current agreed route, and there is no current provision for a junction with the planned HS2 route, although required to provide direct access between northern England and the Channel Tunnel. Creating an underground junction later would require HS2 services to be halted unless a stub tunnel is provided.</p>
208	92	Local Resident	Chris	Bell			T5		<p>I would prefer to see existing routes used where possible, but designed and built to cater for future requirements. There should only be through services at or around Old Oak, none should normally terminate in the area, and there should not be any need for a termination platform close to the already crowded Old Oak area, although additional platforms could allow more time for passenger transfer when congested.</p>
208	93	Local Resident	Chris	Bell			T5		<p>In my opinion, a station to the east of Old Oak should be slightly south of the junction between the branches towards Wembley Central and Willesden Junction High Level where it could be served by both London Overground Clapham Junction branch and through services currently supplied by Southern which could provide multiple direct links from very large areas south of London and north west of London (at present Croydon and Milton Keynes). This may be more difficult to design and build than the current Hythe Road suggestion, but far more important. It could also be more accessible from the large residential area near North Pole Road.</p>
208	94	Local Resident	Chris	Bell			T5		<p>There are already proposals for using existing links to the West Coast Main Line close to Harlesden station, two branches with services currently provided by Chiltern trains close to Neasden station, Thameslink and East Midlands trains through Cricklewood, together with a new high level station close to the existing Harlesden station.</p> <p>There are proposals for a branch from the Richmond line near South Acton towards Brentford and Hounslow.</p> <p>The Acton Main Line branch could provide an alternative route connecting from the Crossrail / Great Western services, and Heathrow, towards the north of London.</p>
208	95	Local Resident	Chris	Bell			T5		<p>There would be many more possibilities for through routes via a station to the west of Old Oak on the London Overground route between Richmond and Willesden Junction High Level using existing tracks if it is sited further south, between the Dudden Hill and Acton Main Line junctions in the area known as Acton Wells. Pedestrian access could be provided from the very busy North Acton area. This may be more difficult to design and build, but in an industrial area, and in my opinion worth the effort. The ground level would be close to track level unless the platforms need to extend towards the Central line where there is a high level bridge, but there should be adequate space for supports on either side of the existing rail bridge.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
208	96	Local Resident	Chris	Bell			T5		If the new station to allow transfers between London Overground Richmond branch and Old Oak / HS2 could be sited between the existing Dudden Hill route and the existing link to Acton Main Line it could be used as a branch of the Elizabeth Line (Crossrail) towards North London, and even provide a direct link between Heathrow and Luton Airport.
208	97	Local Resident	Chris	Bell			T5		The gaps left in the Elizabeth Line service towards London could be filled by trains using the proposed Chiltern Line extension through North Acton. There used to be a once per week route-holder service which was not advertised but I think ran from Bicester through High Wycombe, West Ruislip, and North Acton to Paddington, and I saw a Chiltern Line train going through North Acton towards Paddington Thursday morning 19th July 2018.
208	98	Local Resident	Chris	Bell			T5		Pedestrian access from my suggested station location near North Acton to the Elizabeth Line / HS2 stations may be slightly further than the other proposed location to the north of the Dudden Hill junction, but could be provided close to existing tracks to be used by the extended Chiltern Line service. This would be a straighter route, and could even include "Travelator" style moving pathways, one reversible between one each way, for the benefit of less able pedestrians, closer to the level of the Chiltern Line tracks and so below the level of houses in Wells House Road. It could even be used as a direct pedestrian route from North Acton to Old Oak, which although only a short distance is not currently possible. The only pedestrian routes at present require long detours either along Victoria Road towards Willesden Junction or Wales Farm Road and the Western Avenue, with a possible short cut via Westcott Park, a very narrow unlit footbridge and public footpath. There is no public access to the gated path between Victoria Road and Old Oak Common Lane across the Central Line. I am well aware of the distances involved having lived in the area all my life, (since 1943). I walked from Leamington Park to Acton Wells Primary School in School Road, while my second school was east of Hammersmith Hospital in Du Cane Road.
208	99	Local Resident	Chris	Bell			T5		If the new station to allow transfers between London Overground Clapham Junction branch and Old Oak / HS2 could be sited south of the existing junction with the Wembley Central line currently used by Southern trains it would also enable access to a direct link from Gatwick and Brighton to the West Coast main line.
90	153	Local Resident	John	Cox			T5	7.37; and Fig 7.12	There is uncertainty around delivery of London Overground stations at Old Oak Common Lane and Hythe Road. Other train operating companies must also be able to use those stations, and all platforms must be at least 8-cars long (based on 30-metre carriages) to accommodate them
90	154	Local Resident	John	Cox			T5	7.37; and Fig 7.12	No station(s) are proposed in the Local Plan on the Dudding Hill Line, for future West London Orbital (WLO) services (again a mixture of London Overground and longer-distance, 8-car trains).
90	155	Local Resident	John	Cox			T5	7.37; and Fig 7.12	Optimum 8-car platform locations adjacent to Harlesden Station and to Old Oak Common Lane Station need to be protected in the Local Plan. The potential for the Dudding Hill Line to operate longer-distance inter-regional services requires protecting sites for longer platforms, even if they are not built immediately.
90	156	Local Resident	John	Cox			T5	Fig. 7.12	There are rail links not shown in figure 7.12, and they must be added: - a link from the GWML east of Acton Main Line station to the North London Line south of the Central Line bridge - the West London Line chord to the westbound WCML - the North London Line chord to the eastbound WCML.
90	157	Local Resident	John	Cox			T5	Fig. 7.12	Dismantled freight railway lines need to be recognised, the surviving land protected, and shown in figure 7.12. Examples are the White City to North Acton line, and the line under the A40 immediately to the west of the Central Line
99	626	Residents Association	John	Haston	West Twyford Residents Association		T5		Development proposals will be supported where they : 8. 'ensure the impact of new development adjacent to rail infrastructure appropriately mitigates it's impacts on rail services' – to do this effectively developers need to know line and level of the service to design a community and businesses around it. The proposed Hythe Road station was previously on a viaduct with Hythe Road passing uninterrupted beneath the station. However Hythe Road and Old Oak Stations are currently only "potential" stations. (See supporting text 7.37.) When are they to be confirmed or not?
99	627	Residents Association	John	Haston	West Twyford Residents Association		T5		H2 and Elizabeth Line are coming on line 2026 – with a rumour that HS2 might be terminating at Old Oak station as Euston Station initially - as redevelopment at Euston will not be completed by 2026?
99	628	Residents Association	John	Haston	West Twyford Residents Association		T5		It has been stated at presentation that HS2 and the Elizabeth Line will be the 2nd busiest station next to Waterloo – so are disembarking passengers going to continue their journeys by road?
28	702	Strategic Partner	Lucinda	Turner	Transport for London		T5		Any proposals for potential long-term redevelopment that affected operational rail facilities including the London Overground depot at Willesden Junction and the site at North Pole would need to take account of future operational needs and TfL welcomes recognition of this factor. TfL is pleased to note that the London Overground depot at Willesden Junction is not proposed for development during the Plan period. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation. We acknowledge that this places constraints on the development of some sites within the Local Plan area, but retaining operational rail facilities is important in maintaining and improving transport services into the future both within the area and further afield.
28	764	Strategic Partner	Lucinda	Turner	Transport for London		T5	7.37	TfL welcomes the addition of the word 'potential' when referring to London Overground stations to better reflect their current status
28	765	Strategic Partner	Lucinda	Turner	Transport for London		T5	7.38	TfL welcomes the amended wording which allows flexibility in how the public realm around the station will be designed
28	766	Strategic Partner	Lucinda	Turner	Transport for London		T5	Figure 7.12	TfL welcomes clarification that London Overground stations at Hythe Road and Old Oak Common Lane are potential rather than existing but the notation for the potential West London Orbital route should make the same distinction

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
229	1000	Local Resident	Alan	Goodearl			T5		<p>I still worry about links between the stations. I understand that there are great problems to do with heights and tracks but I still feel that it is a shame that they could not have been consolidated into one station: to make it easy for people to change trains without confronting (and adding-to) the congestion of central London.</p> <p>If that cannot be managed then I wonder if something more creative might be tried to link the separate stations, eg with escalators and moving pavements, trams or driverless pods? If the stations are shown as separate on rail maps then people will not risk walking or taking a bus through a part of London they do not know, even if the journey is short. They will instead carry-on in to the centre and take the tube which, even if crowded and uncomfortable, is simple to navigate.</p> <p>I am old enough to remember the problems of Broad Street and Liverpool Street stations - essentially one, but not presented as such and with an awkward (if short) walk between them. The linking of Kings Cross with St Pancras has made a big difference, but you still see people lost on the underground or on the Euston Road, trundling suitcases between them and Euston station. We curse the Victorians for not thinking and building in a joined-up way. I hope future generations won't curse us.</p>
56	1258	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T5	d)	<p>See council response for T4 above</p> <p>Amend point (d) of Policy T5 as follows:-</p> <p>"d) appropriately manage the demands of competing transport modes and interchange requirements for walking, cycling, Zero tailpipe Emission buses and taxis, ensuring adequate space is provided and embedded into the public realm";</p>
56	1259	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T5	Para 7.40	<p>See council response for T4 above</p> <p>Amend Para 7.40 as follows:-</p> <p>"....This should include provision of direct and legible step-free access from the station to appropriately sized and well located walking, cycling, zero tailpipe emission bus and taxi and drop off infrastructure..."</p>
110.b	1441	Community Group	Robin	Brown	Grand Union Alliance		T5		<p>OPDC's new town centres will be built around new or expanded railway stations which will receive very limited democratic input into their design and planning, not least because they are in private ownership, private management, and will be approved through the HS2 Act Schedule 17, bypassing scrutiny under the Town Planning Acts.</p>
110.b	1524	Community Group	Robin	Brown	Grand Union Alliance		T5		<p>7.37 referring onto fig.7.12: Uncertainty around delivery of Overground stations at Old Oak Common Lane and Hythe Road. No station(s) are proposed for the Dudding Hill Line for the future West London Orbital services. Optimum proximate locations to Harlesden Station and to Old Oak Common Lane Station need to be protected. The potential for the Dudding Hill Line to provide for longer regional (SE & S of England) services requires protecting for longer platforms; and for a link to the west via Ealing Broadway along a railway line not shown on fig. 7.12. Freight railway lines need to be recognised, protected and shown on fig. 7.12. For example, the White City to Willesden Junction line.</p>

Policy T6: Buses

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
203	16	Local Resident	King Wei	Ling			T6		<p>I am a Harlesden resident and I have reviewed your proposal I noticed there were no direct routes (bus or train) from Harlesden to the Old Oak common Elizabeth Station. I think having a bus at least from Harlesden or Hill side would be beneficial for those of us wishing to access the city.</p>
90	158	Local Resident	John	Cox			T6	7.46; and Fig 7.14	<p>7.46 and referring to figure 7.14: There is no direct service from Willesden Junction and Harlesden into Old Oak North and then to Old Oak South. This becomes even more important if Hythe Road Station is not delivered and the high levels of public transport accessibility of Old Oak North (see figure 7.11) needed for intense development are not achieved.</p>
90	159	Local Resident	John	Cox			T6		<p>Wesley Estate is isolated and distant from community supporting facilities. This needs to be remedied, as does the lack of more direct bus route to North Acton Station and beyond. For personal security reasons, the 'potential future bus network' should therefore include a direct link between North Acton Station and the Wesley Estate (perhaps when adding route 7, or by diverting the 187 or 440).</p>
90	160	Local Resident	John	Cox			T6	Fig. 7.14	<p>The 'existing routes' lines in figure 7.14 are not all accurate.</p>
92.b	438	Community Group	Melanie	Whitlock	The Hammersmith Society		T6	Figure 7.14	<p>Policy T6 Buses. The maps in the draft are hard to read and it is not clear that there is sufficient bus connectivity within the OPDC area.</p>
92.b	439	Community Group	Melanie	Whitlock	The Hammersmith Society		T6		<p>The area will be among the best connected in the country if people wish to get in or out, but for it to be a successful, sustainable community there must be excellent internal transport connecting the places and clusters, for example, using an innovative driverless system. Without a policy for a transport system within the site the transport policy cannot be regarded as positively prepared.</p>
47	599	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		T6	7.14	<p>The draft plan still does not resolve how the physical connection from Scrubs Lane to North Pole West will be achieved. Resolution is essential in this part of London is to be linked up satisfactorily. This plan is the opportunity for this resolution. At Figure 7.14 there is a plan of a "future potential bus network". This does not include a desired route to Kensal Canalside through North Pole Depot. The reason for this is that the plan actually shows the envisaged network on the opening of HS2 in 2026. The title of the plan should be modified so that it is clear this is potential bus network in 2026. We would expect a more elaborate network in 2041 but we appreciate that there is insufficient information at the present time to specify what that might be.</p>
99	629	Residents Association	John	Haston	West Twyford Residents Association		T6	Para 7.48	<p>9. 7.48 – 'Bus services will be particularly important in the early phases' I do not think that this paragraph should be deleted. A car free community needs a good, clean, frequent, and competitively priced service that is given priority on the roads to allow faster journey times compared to the car. It has to be attractive to users to get people out of their cars. It will be needed during the construction phase as well and routes will alter as the development grows with projects coming on line.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
28	700	Strategic Partner	Lucinda	Turner	Transport for London		T6		Longer term plans for the future bus network in the area will need to be developed in line with the Bus Strategy recently produced by TfL which we are pleased to see included as part of the Local Plan Evidence Base. There will need to be enhanced bus connectivity and increased capacity, partly funded through developer contributions as well as new passenger and operational infrastructure including bus priority measures, bus stops, shelters and stands etc. to support delivery of the strategy.
28	767	Strategic Partner	Lucinda	Turner	Transport for London		T6	Policy part a, 7.43, 7.44 7.46 and Figure 7.14	TfL welcomes the recognition of the important role buses will provide in delivering good public transport in this area, particularly in the early years of development and the need for temporary infrastructure or routes in early phases. TfL has worked closely with OPDC to develop a bus strategy for the area that can be delivered in phases to support new development. Additional references to the existing and future bus network in part (a) provides helpful clarification and TfL welcomes the explicit mentions of the Bus Strategy in 7.43, 7.46 and figure 7.14. TfL will work with OPDC to secure developer contributions to provide additional bus capacity and ensure delivery of the Bus Strategy over time
56	1260	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T6	a)	See council response for T4 above Amend Policy T4 as follows:- Development proposals will be supported where they: a) facilitate, deliver and contribute to the existing and future Zero tailpipe Emission bus network and infrastructure, including the range of interventions identified within the IDP to provide a comprehensive and coherent bus network across Old Oak and Park Royal that is connected into the surrounding area, including priority measures where appropriate;
56	1261	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T6	Para 7.49	See council response for T4 above Amend Para 7.49 as follows:- London's green bus fleet is the largest in the world, combining the roll-out of new hybrid buses, the early introduction of new Euro VI buses and the retrofit programme, leading to significant improvements in emissions throughout London. OPDC will work with TfL and bus operators to promote the roll-out of Zero tailpipe Emission buses and ensure that the design of transport infrastructure in the OPDC area facilitates environmental improvements to the bus fleet.
56	1262	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T6	Para 7.49	There should be a clear target set i.e. 2030. The language used is rather ambiguous and does not show any long-term ambition. The target should be 2021 as this is the year ULEZ will be introduced across London including Hammersmith and Fulham.
110.b	1525	Community Group	Robin	Brown	Grand Union Alliance		T6		7.46 referring onto fig. 7.14: No direct route/service between Willesden junction and Harlesden into Old Oak North and thence to Old Oak South. This becomes all the more important to provide if the proposed Hythe Road station is not delivered and so the high levels of public transport accessibility of Old Oak North [see fig. 7.11] upon which intense development is predicated will not be assured, compromising its sustainability. Wesley Estate is isolated and distant from community supporting facilities. This needs to be remedied as does the lack of more direct bus route to North Acton (Station) and beyond.

Policy T7: Freight, Servicing and Deliveries

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
28	768	Strategic Partner	Lucinda	Turner	Transport for London		T7	Policy part a and 7.59	TfL supports the amended text to clarify the requirement for Construction Logistics Plans (or CLPs) in accordance with TfL guidance
28	769	Strategic Partner	Lucinda	Turner	Transport for London		T7	Policy part a and g	TfL has worked closely with OPDC to develop a Construction Logistics Strategy for the area. We welcome amendments to policy wording to reflect emerging work as part of strategy development
55	1060	Agent	Jonathan	Stoddart	CBRE	Segro	T7		Part d) of Policy T7 'Freight, Servicing and Deliveries' encourages development 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. SEGRO supports the use of more sustainable modes of freight movement, as set out above. However, there are currently infrastructure constraints which limit our customers' ability to maximise use of these modes, and some of these are summarised below: <ul style="list-style-type: none"> • River freight is considered to be slow and so is only really appropriate for transporting goods that are not time sensitive. It also needs to be supported by sufficient infrastructure on the river banks to load and unload goods at both the point of delivery and to end customer. • Electric vehicles usage needs to be supported by the right infrastructure which isn't currently widespread and so requires significant investment. For instance, the capital investment required for hydrogen stations is approximately four times that of petrol stations, and this suggests that commercial delivery of such stations may be slow unless supported by government policy and fiscal incentives. • Cargo bikes and last mile deliveries by sustainable modes can be appropriate for short journeys, but their wide-spread introduction requires a network of industrial estates/premises which are located near to the markets they serve. The current network of SILs and LSIS in London does not match up with the current concentrations of business/domestic markets, which acts as a constraint on using bikes and other exclusively last mile transport modes.
56	1263	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T7	d)	See council response for T4 above Amend point (d) of Policy T7 as follows:- "d) maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water, electric vehicles, cargo bikes and Zero Tailpipe Emission last mile deliveries by sustainable modes"

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1264	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		T7	Para 7.51	See council response for T4 above Amend point (g) of Para 7.51 as follows:- "g) encouraging the adoption of Zero tailpipe emission vehicle options (buying or leasing)"
120	1631	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		T7		HNF welcomes the statement (7.50) that servicing and delivery requirements should have minimal impact on the surrounding road network. However, it is difficult to see how this can be achieved without substantial improvements to the existing road network are made. Any required Delivery Service Plan must include an impact assessment on existing roads and the routes through existing neighbourhoods, not just the new developments themselves. Consideration should be given to innovations such as the feasibility and value of incorporating holding areas into the already significant number of delivery depots already present in Park Royal, although movement out of Park Royal to Old Oak necessarily requires travel through Harlesden Town Centre. This is unacceptable to HNF, electric vehicles or not.

Policy T8: Construction

No comments

Policy T9: Transport Assessments and Travel Plans

No comments

Chapter 8. Housing

Policy H1: Housing Supply

Res. Ref	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
36	279	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		H1		Comments were made on Draft policy H1 and the target for delivering new homes per year. The Mayor remains concerned that by using a 20-year target, the figure is below that set out in the draft London Plan, and does not represent the Mayor's expectation for increased housing delivery in the OPDC area. Policy H1 should make specific reference to the 10-year target of 13,670 set out in the draft London Plan. This figure was agreed with OPDC and is supported by the development capacity study.
47	600	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		H1		It is noted that the housing target for the OPDC area has reduced from the previous 22,350 new homes to 20,100. This has been undertaken to align with OPDC's revised Development Capacity Study over the next 20 years. The overall capacity of OPDC is identified as 25,500 homes. The Council has no objection to this reduction in housing targets over the Plan period. However, it is noted that the annualised target resulting from the 20 year capacity figure is 1,005 homes which is less than the annualised Draft London Plan target of 1,367 homes. This does not impact on planning for housing for the Royal Borough which has identified its own need figure. It is noted that new para 7.10 seeks to address this issue. The Council's own housing targets are proposed to be reduced in the Draft London Plan based on the latest evidence of capacity as set out in the London SHLAA 2017.
35.b	1042	Planning Consultant	Bridget	Miller	HGH Consulting	Queens Park Rangers Football Club and Stadium Capital Developments	H1		We encourage the OPDC to work with partners to identify opportunities to bring forward the early delivery of new housing. The delivery of Oaklands is a good example and QPR and SCD welcome the opportunity to work with the OPDC to bring forward their other land holdings in a similar manner.
56	1274	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		H1	Para 7.8 and 7.10	The policy sets out the OPDC's annual housing target of 1,005 units per annum. Paragraph 7.8 refers the Development Capacity Study (DCS) being able to deliver 20,100 homes over the plan period, next 20 years. Paragraph 7.10 then refers to the revised London Plan annual housing target of 1,367 between 2019 about 2029 (ten year period). In the same paragraph, it states that the DCS supports this and demonstrates that 1,359 units of this annual target figure. Whilst LBHF supports a lower annual housing target figure in terms of density and place-making, it is unclear which evidence base is the most important here.
120	1633	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		H1		HNF welcomes the commitment to support new models of delivery and management of housing and community assets, including Community Land Trusts, Community Right to Build and Community Asset Transfer. HNF would welcome further dialogue with ODPC to explore ways in which this ambition could be taken forward in a way that reflects the needs and preferences set out in the draft NP for Harlesden.

Policy H2: Affordable Housing

Res. Ref	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	40	Planning Consultant	Ashley	Collins	JLL	Imperial College	H2		Organisations like Imperial College London are finding that the shortage of housing that is affordable, is diminishing the attractiveness of London as a place to live and work, making it difficult to attract and retain the best academic and research minds. The high and rising cost of living in London is a fundamental threat to Imperial College London. Staff are the most critical resource in maintaining its global top 10 status. The cost of housing is an issue across all levels of Imperial College London's 8,000 strong staff. There is a particular crisis for its postdoctoral community of around 2,500 people. Attracting and retaining this highly skilled group of people is a high priority for Imperial College London and the wider business and tech community. The globally competitive nature of these research fields, combined with the high cost of living in London, results in too many of the very best researchers taking up offers at institutions in more affordable locations. A recent survey by Imperial College London of the postdoctoral research community identified that they are already considering leaving and potential new recruits are not taking up offers, due in part to the high costs of living in London. Indeed, the survey found that 58% respondents viewed housing costs as the biggest challenge to working in the capital. The OPDC needs to recognise that traditional forms of affordable housing do little to meet the needs of this group. Therefore Imperial College London is now directly providing key-worker homes in order to address this problem and is committed to building a portfolio of such key-worker accommodation for its staff, with affordability weighted to target the income banding of its postdoctoral staff and others. It is therefore requested that the supporting text to Policy H2 is expanded to specifically recognise that particular organisations are encountering housing problems that are having an adverse impact on their business, and that they will be supported by the Mayor in plans to provide their own key-worker housing and that each such proposals will be considered on their merits.
23	105	Local Authority	Muhammed	Butt	London Borough of Brent		H2		Policy H2 sets a target of 50% affordable housing for major developments. It is proposed this comprises 30% London Affordable Rent and 70% intermediate, such as London Living Rent and London Shared Ownership. The Council maintains a higher proportion of London Affordable Rent should be sought, reflective of the objectively assessed need in the housing market area. The adopted Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017) sets a preferred tenure split for affordable housing of 30% low cost rent (social rent or affordable rent), 30% intermediate products and 40% to be determined locally. The SPG does not set out an approach to determining the 40%, but in light of the NPPF it is considered a key factor should be objectively assessed need in the housing market area. Since the Council last objected to this policy, the London Boroughs of Brent, Hammersmith & Fulham, Ealing, Barnet, Harrow, Hillingdon, Hounslow and the OPDC have jointly commissioned a West London Strategic Housing Market Assessment (SHMA). The SHMA indicates that nearly all of those in affordable housing need across the housing market area cannot afford anything more than social rent. This further emphasises the importance of prioritising London Affordable Rent over intermediate products. Brent Council upholds its objections and believes policy H2 of the Plan remains unsound on the grounds it is not consistent with national policy, positively prepared or effective.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
23	106	Local Authority	Muhammed	Butt	London Borough of Brent		H2	c)	Change sought For the Plan to be sound Brent Council is seeking policy H2 to be amended as follows: (Deleted text struck through, new text underlined) 'c) providing 360% of affordable housing as London Affordable Rent and 4070% as a range of Intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6) and including units that are affordable to households on average incomes in the host local authorities.'
42	213	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	H2		We continue to consider that the target for 50% of all housing to be affordable is very ambitious. We welcome clarifications within the document to acknowledge the significant cost of infrastructure required in Old Oak North, but continue to consider that these costs would have been more appropriately addressed through a lower headline target more reflective of the constraints on development at Old Oak.
36	280	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		H2		The Mayor recommended that the proposed Plan should specifically include the 35% (without public subsidy) threshold as well as the 50% threshold for public land, as set out in the Mayor's Housing SPG. This threshold approach has now been confirmed in the draft London Plan, with an additional 50% threshold for industrial land. The Mayor is pleased that amendments have been made to the policy to reflect the previous comments, and the Local Plan now refers to applying the most up-to-date Mayoral policy.
36	281	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		H2		The Local Plan proposes a tenure split of 30 per cent London Affordable Rent, and 70 per cent as a range of intermediate housing. This is not consistent with the Mayor's presumption, set out in the draft London Plan, that the 40 per cent to be decided by the borough will focus on Social Rent/London Affordable Rent given the level of need for this type of tenure across London. OPDC should consider how the policy can better reflect the Mayoral presumption.
36	282	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		H2	8.26	Paragraph 8.26 refers to Starter Homes. This product may not meet the Mayor's definition of genuinely affordable housing and it is suggested the reference is removed.
47	601	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		H2		We provided detailed comments on the OPDC SHMA previously which are still valid.
30	788	Local Authority	Steve	Barton	London Borough of Ealing		H2		I would reiterate that Ealing supports the strongest possible emphasis on the delivery of affordable housing at Old Oak. Delivery of the maximum practicable level of affordable housing is central to the case for OPDC to function as a landowner and development body. Subsequent to the last OPDC consultation the London Plan has been published reiterating the Mayor's SPG commitment to a 30:30 split of social rented to intermediate housing and emphasising a presumption in favour of social rent tenures for the remaining 40% unless local assessments of need indicate otherwise. I note that OPDC's reason for departure from this recommended housing split is based on viability rather than need. It may be that 50% affordable housing target cannot be achieved on all developments, but the priority should always be on securing housing which is genuinely affordable in the context of local need.
56	1275	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		H2	c)	LBHF retains the same concerns as set out in our previous response to OPDC's Local Plan consultation (Regulation 19) regarding the tenure split proposed in Policy H2. LBHF does not consider this policy to be in conformity with national or London Plan policy. London Plan policy 3.11 sets the approach reflective of London's needs, 60% of affordable housing provision to be for social and affordable rent and 40% for intermediate rent or sale. The NPPF requires Local Plans to meet the objectively assessed need for market and affordable housing. Local Plans are to provide for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Given the high affordable housing needs identified in the SHMA, which covers LBHF HMA, the Council does not consider this policy to be positively prepared or effective. LBHF acknowledges that viability is an important factor and part of the evidence in Local Plan preparation. However, the mayor's Affordable Housing and Viability SPG 2017 gives LPAs flexibility to decide the appropriate tenures for affordable housing. The Mayor's preferred tenure split is: <ul style="list-style-type: none"> • At least 30% low cost rent (social rent or affordable rent) with rent set at levels that the LPA considers 'genuinely affordable' (this will generally be significantly less than 80% market rent). • At least 30% as intermediate products, with London Living Rent and/ or shared ownership being the default tenures assumed in this category. • The remaining 40% to be determined by the relevant LPA which can be drawn from the tenures above or could include other products where they are evidenced as genuinely affordable and are consistent with the London Plan's definition of affordable housing. We recommend that this flexibility is retained for two main reasons; 1. Shared Ownership is generally not appropriate for properties with market values in excess of £600k as is noted in the SPG. In H&F, this is likely to be the vast majority of homes larger than 1bed, and; 2. to strengthen the LPAs' negotiating position with developers. This is particularly important because the text here reads; "Delivering London Affordable Rent housing has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Delivering intermediate housing (including London Living Rent and London Shared Ownership) helps to improve the overall viability of delivering affordable housing." This implies that the compensation for providing London Affordable Rent is to provide Shared Ownership and London Living Rent products closer to the upper income threshold for affordable housing (currently £90k) which is contrary to this Council's Housing Strategy and would rule out almost everyone on this Council's intermediate housing register. H&F recommend retention of the flexibility outlined in the SPG to allow the Council to adopt the shared equity model as the alternative affordable housing product to shared ownership and London Living Rent while retaining flexibility to use any of the three products best meet the affordability of residents and workers in the borough. LBHF has adopted a 60% affordable rent/40% intermediate housing split, in line with the London Plan. The flexibility outlined above provides the OPDC greater opportunity to align with LBHF policy that will better meet the housing needs as identified in the SHMA.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1276	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		H2	c) and para 8.24	<p>Policy H2 (c) still refers to the use of average incomes in the host local authorities. LBHF retains the same concerns as set out in our previous response to OPDC's first Regulation 19 Local Plan consultation regarding the use of average incomes in Policy H2.</p> <p>LBHF use the median income as a benchmark and only apply this to intermediate homes only, as London Affordable Rent should be affordable to people on low (i.e., below average) incomes. Our preference for intermediate homes is for them to satisfy the policy of meeting different income ranges in our housing strategy. LBHF's position is:</p> <p>The 40% for intermediate rental and sale homes, they should be affordable to residents earning under £60,000 and be guided by the income thresholds set in the Council's housing strategy. For intermediate dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and 10% deposit requirements), rent and service charges should be no greater than 40% of net household income, where 40% of net income is no greater than 70% of the gross income.</p> <p>LBHF would welcome aligning with LBHF's housing policy to ensure that development in the OPDC area can actually meet those in housing need in LBHF.</p>
56	1277	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		H2	Para 8.25	<p>LBHF support this. We would also welcome early engagement with the host boroughs as part of discussions on the design of affordable housing.</p> <p>Amend Para 8.25 to make reference to involving host boroughs in these discussions:-</p> <p>"At the start of the design process, applicants should work positively with OPDC and other relevant stakeholders including host boroughs to consider how the design of proposals can support delivery of a range of tenures on site.</p>
239	1597	London Assembly Member	Sian	Berry	London Assembly		H2	8.19	<p>The Strategic Housing Market Assessment (SHMA) that underpins the draft London Plan found that 47 per cent of new homes delivered in London up to 2041 should be at low cost rent – social rent. And that accounts for about 70 per cent of the 'affordable' homes in general. The Mayor's draft London plan also says he wants to see a minimum of 30 per cent social rent and 30 per cent intermediate homes at each development with the other 40 per cent left for the local authority – in this case the OPDC - to decide, based on local need. At the OPDC plenary meeting I questioned the interim Chief Executive about the tenure split of affordable homes he expected to deliver at Old Oak He said "if we secure the 50 per cent (overarching strategic affordable housing) target, the number of affordable homes will be 10,050, the number of London Affordable Rent homes will be 3,015, and the level of intermediate housing will be 7,035. That is if we get to that target of 50 per cent. As we have already alluded to, that might be a challenge on some sites. If we have 35 per cent affordable housing, what we would secure is 7,035 affordable units, 2,111 London Affordable [Rent] and 4,925 intermediate units". In each case, the tenure split proposed does not respond to the OPDC's own assessment of local housing need. OPDC's SHMA identified that there is a need for 86 per cent London Affordable Rent or equivalent housing as part of affordable housing need in the area. However, the following rationale is given in the latest draft of the local plan for the OPDC failing to meet this need and pursuing an alternative tenure split:"8.22 The AHVA has assessed the viability of delivering different levels and types of affordable housing. Delivering London Affordable Rent housing has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Delivering intermediate housing (including London Living Rent and London Shared Ownership) helps to improve the overall viability of delivering affordable housing. Further evidence on tenure, housing need and development viability is available in the supporting Housing Evidence Statement"; and "8.23 In order to create inclusive new communities at Old Oak and Park Royal that are mixed and balanced by housing tenure and household income, OPDC's target ratio for affordable housing is: a) 30% London Affordable Rent; b) 70% mix of intermediate housing including London Shared Ownership and London Living Rent. At the OPDC plenary meeting, the interim Chief Executive argued that the OPDC had tested the viability of meeting its obligations to the Mayor by following his policy of setting tenure split "according to the identified need" of the local population and concluded it is not viable. In contrast to this, amendments to the latest draft local plan, in section 8.19, means it now says:"8.19... the presence of abnormal site constraints should impact on land values; however, the cost should not necessarily be borne through a reduction in planning obligations."This means that the tenure splits required by the OPDC SHMA can also be achieved without compromising planning obligations. This change to policy 8.19 shows that additional obligations can be achieved without compromising planning requirements. It means the OPDC leadership should be pushing harder to achieve a tenure split that meets the acute need for social housing in the local area. This can be achieved with lower land values – especially where lower cost public land is being used or is acquired by OPDC.At present, the draft local plan is not "based on a strategy which seeks to meet objectively assessed development and infrastructure requirements," i.e. it is not prepared positively. Policy 8.19 should be clarified and tenure splits corrected in policy 8.23 to allow the OPDC to meet the objectively assessed development requirements of the OPDC site.</p>
239	1598	London Assembly Member	Sian	Berry	London Assembly		H2		<p>During the plenary meeting the interim Chief Executive referred to figures not available on the London Development Database (LDD).To enable proper scrutiny of the OPDC's progress in delivering affordable housing at Old Oak, the OPDC should report more regularly to it and LDD updates should be published with information about the latest permissions, not once per year as is currently the case. Until more frequent LDD updates are available, the OPDC should maintain a rolling list of permissions on the London.gov.uk website.</p>
120	1632	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		H2		<p>HNF continues to support the target of 50% affordable homes.</p> <p>As so many of the sites are already in either public ownership or the proposed developers we expect that recent changes to viability testing to reduce loopholes will ensure this target can be met.</p>

Policy H3: Housing Mix

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	214	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	H3		<p>We consider that the target to provide 3 or more bedrooms in 25% of all new homes is the wrong approach for what is an entirely new quarter for London. The OPDC area provides an important new opportunity to create a new high-density, highly accessible part of Central London in West London to deliver a large number of new homes to make a significant contribution to London's housing crisis. We consider</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
									that basing the target mix on an SHMA which assesses need in the established residential neighbourhoods in the surrounding area is flawed in the context of the new development. The OPDC housing supply should be considered in the context of meeting a London-wide demand, but with specific factors which include: <ul style="list-style-type: none"> · The long-term nature of regeneration activities at OOP means that for much of the time new residents will be moving into an area that is undergoing active change; · The need to establish momentum of delivery and a critical mass in the earlier stages of development, necessitating faster sales rates; · The desire to maximise the number of new homes through higher density development which will make the best use of the significant new transport infrastructure being delivered.
42	215	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	H3	8.35	Whilst 8.35 does recognise that the mix will not be applied 'rigidly', this works from an 'expectation' that developments will deliver 25% family units, despite noting that London-wide developments have delivered 20% family housing on average. We also note that the Housing Evidence Statement (at paragraph 8.5) states that the OPDC will be high density and so 'challenging and undesirable' too have a high family housing target, 'as many units would be unable to access appropriate amenity and play space'. For a scheme the size of OOP, this requirement represents approximately 1,625 family units. We do appreciate the recognition in Chapter 4 that family units are likely to be skewed towards the latter phases of the development, but we think the Local Plan needs to do more to set a realistic and appropriate target for family units that avoids unnecessary conflict at the planning application stage.
42	216	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	H3		We also draw your attention to policy H12 of the Draft London Plan, which states that Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes, and recognises that 1 and 2-bed units have a role to play in freeing up homes elsewhere for families. The supporting text at paragraph 4.12.13 also states: Family units have historically been considered to be those consisting of three or more bedrooms. However, as many families do live in two-bedroom units this should be taken into account when assessing the needs that different sized units can meet (in terms of bedrooms) and the design and approach to management of a development both for market and affordable housing. Policy H3 should be updated to reflect this emerging policy approach.
36	283	Statutory Consultee	Julietta	McLoughlin	Mayor of London		H3		Policy H3 sets out a requirement for 25 per cent of all new homes to provide 3 or more bedrooms. As set out in policy H12 (Housing size mix) of the draft London Plan, boroughs should not set prescriptive size mix requirements for market and intermediate homes. This includes blanket requirements for the size-mix of the cross-tenure supply. Such requirements are inflexible and can fail to meet the intended need, for example, family-sized homes often end up being occupied by sharing adults rather than families, and inflexible requirements can prevent otherwise suitable sites coming forward for residential development. Boroughs should provide guidance on their preferred size mix of low cost rent homes, as these can be expected to directly contribute to meeting identified needs.
56	1278	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		H3	Para 8.35	LBHF supports this. This should also refer to OPDC's monitoring of development.

Policy H4: Family Housing

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	217	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	H4		It is also important to consider the overall proportion in relation to the design guidance at Policy H4. H4 a) and paragraph 8.40 state a preference for family housing to be located at ground or first floor level, or where higher to have direct level access to private and secure open space (i.e. more than just balconies). To have this for 25% of units in a high-density development is not possible and so the vast majority of family units are likely to be provided in accordance with part b) of this policy.

Policy H5: Existing Housing

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
36	284	Statutory Consultee	Julietta	McLoughlin	Mayor of London		H5		Policy H5 seeks to maximise housing supply, including residential conversions. The OPDC should consider how the reference to general character in c) iii) relates to draft London Plan Policy H2. This states that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments.

Policy H6: Build to Rent Housing

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	41	Planning Consultant	Ashley	Collins	JLL	Imperial College	H6		The build to rent sector does help provide a different form of housing. Imperial College London wishes to register its support for the recognition given to the fact that the build to rent sector has very different financial and viability characteristics to market sale. It is therefore entirely appropriate that the type of affordable housing it offers is discounted rent in line with London Living Rents.

Policy H7: Co-Living and Shared Housing

No comments

Policy H8: Gypsy and Traveller Accommodation

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
47	602	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		H8		These comments are in addition to comments made to the first round of Regulation 19 consultation and focus on the changed text. In summary comments to the first R19 consultation sought for OPDC to acknowledge the joint needs identified in the joint LBHF/RBKC GTANA. The Joint need is relevant to OPDC as LBHF is one of its host boroughs. Policy H8 a) has been amended from protecting the existing Bashley Road site to safeguarding it and working with Ealing to enhance the site where required. However, this is at odds with paragraph 8.65 of the supporting text which states that "As the local planning authority, OPDC is required to allocate sites to meet identified gypsy and traveller accommodation needs. OPDC will safeguard the site at Bashley Way for this purpose." The effectiveness of Policy H8 a) would be significantly improved by clearly stating that capacity will be increased or the existing site expanded if necessary.
47	604	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		H8		The addendum update concludes that the existing Bashley Way site is fully occupied with no potential for additional pitch provision because there is no possibility to expand the site as it is located within SIL. Therefore, there appears to be a disconnect between the evidence base and Policy H8 and its supporting text (see above). It is unclear whether the site is being safeguarded for existing need, future need or purely to protect it from loss to other land uses.
232	1090	Community Group	Ilinca	Diaconescu	London Gypsies & Travellers		H8		We welcome the commitment to safeguard the existing Gypsy and Traveller at Bashley Road and to work with LB Ealing to improve the site. However we are concerned that this is not sufficient to address the inequalities facing the Gypsy and Traveller community living on the site, particularly in terms of health and wellbeing. The site is currently facing a range of significant pollution impacts from neighbouring uses and a history of neglect in terms of repairs, refurbishment and maintenance. Gypsies and Travellers face higher health inequalities, both physical and mental, including a Life expectancy between 10-12 years lower than other ethnic groups. Historically, due partly to marginalisation and discrimination, many Gypsy and Traveller sites have been located in areas of high environmental risk, particularly in terms of air and noise pollution. The Park Royal Intensification Study proposes the site at Bashley road/Volt Avenue for a new large scale development. We are concerned about the impacts this will have on the Gypsy and Traveller community at Bashley Road in terms of safety, health and wellbeing. These impacts are not considered in the Study. Given the Mayor of London's commitments to inclusion and addressing health inequalities, and its own Public Sector Equality Duty, the OPDC should ensure that the overall vision for the area advances equality for the Gypsy and Traveller community who have been residents of the borough for many decades and commit to improve their health, wellbeing and social inclusion. To ensure that the policy is justified and positively prepared we would suggest the following: OPDC in conjunction with LB Ealing and in close consultation with the residents of Bashley Road should conduct a site audit in line with Policy H16 in the Draft London Plan to assess overcrowding, need for refurbishment and capacity to expand the site. Based on the findings of this audit OPDC and LB Ealing should work closely with the residents of Bashley Road to develop a project plan to address issues, concerns and needs and bid for the GLA Affordable Homes Programme and other resources as needed to conduct the works as soon as possible. OPDC and LB Ealing should commission ongoing monitoring of air quality, noise pollution etc affecting the residents of Bashley Road and seek to address these issues proactively. OPDC should work closely with the residents at Bashley Road to develop a joint vision for the Bashley Rd/Volt Avenue site identified in the Park Royal Intensification Study, which balances the needs of the Gypsy and Traveller community with the need for new jobs in the area. This should take full consideration of expected impacts and risks and seek to maximise positive outcomes for the residents of Bashley Road.
232	1091	Community Group	Ilinca	Diaconescu	London Gypsies & Travellers		H8	B)	The approach set out in this policy point is not sufficient to address the needs of Gypsy and Traveller communities as identified in the OPDC GTANA and Joint LBHF/RBKC GTANA. The policy and supporting text are based on a misinterpretation of national legislation and policy guidance. Under the Housing and Planning Act 2016 local authorities have a duty to assess the needs of people residing in caravans, irrespective of which definition of 'Traveller' they fall under. This is further explained in the DCLG Draft Guidance on the periodical review of housing needs. The Revised National Planning Policy Framework is clear that 'planning for homes for all Gypsies and Travellers (nomadic and settled) is a strategic policy. Furthermore, the OPDC Local Plan should be consistent with the Draft London Plan which introduces a new, more inclusive definition of Travellers in Policy H16. While the London Plan has not been adopted yet, the OPDC has taken on board other policy direction for example on no net loss of industrial floor space. We are concerned by the differential treatment given to the Gypsy and Traveller accommodation policy and consider this is again a failing to meet the Public Sector Equality Duty. Adopting the Draft London Plan definition at this stage would be a positive step towards advancing equality for a community that faces historic marginalisation. An example of good practice is the London Legacy Development Corporation Local Plan Review which uses the new definition in their housing requirements study and policy on Gypsy and Traveller accommodation. To ensure that the policy is justified and positively prepared we would suggest the following: <ul style="list-style-type: none"> • The figure of 12 pitches needed by 2031 identified in the OPDC GTANA should be included as a target. A breakdown over the 5 year increments would be helpful as this shows the urgent need for 6 pitches by 2021 due to overcrowding on the Bashley Road site and new family formation. • To meet this need in line with NPPF and the London Plan, the policy should include site allocations. We make a number of suggestions for identifying land in the following section. • The delivery of this target should be monitored through a KPI • The need arising from the Joint RBKC/LBHF GTANA should also be mentioned in the policy with a commitment to joint working to identify suitable land • An action plan should be put in place to undertake an update of the GTANA in line with the Draft London Plan policy H16 in particular to identify the needs of housed Gypsies and Travellers in the area and comprising boroughs. However this should not delay any further the delivery of new pitches to meet the need already identified in the previous study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
232	1092	Community Group	Ilinca	Diaconescu	London Gypsies & Travellers		H8		Another issue of concern is the site assessment study in the GTANA Addendum from June 2018. The range of options assessed here is very limited although we understand these have come from consultation with Gypsies and Travellers interviewed for the LBHF/RBKC needs assessment. A similar exercise should have been conducted with residents of Bashley Road to extend the pool of options. In addition a full scale site search and technical assessment should have been carried out by the OPDC. In relation to the three options considered in the study the assessment against the SIL criterion appears to be biased. Site 1 (Bashley Road) is located on SIL – not as an anomaly, as suggested in the report, but because its official opening in the 1980s precedes the SIL designations; being located on SIL is considered a constraint for any potential extension or reconfiguration of the site. However, for Site 2 (Mitre Yard) which is also located on SIL there is a proposal to remove the designation in order to deliver housing. This differential approach is not justified. To ensure that the policy is positively prepared and justified we suggest the following <ul style="list-style-type: none"> The OPDC in conjunction with LB Brent, Ealing and Hammersmith and Fulham should commission a site search study done in close collaboration with Gypsies and Travellers in the three boroughs; this should include not only suggestions made by community members, but a full audit of public land and any sites coming forward from private owners. The criteria for assessment should be agreed in consultation with members of the Gypsy and Traveller community. Parts of large site allocations and large development schemes should be assessed as potential to meet the need for a small number of pitches as part of mixed use development. This should be included in other housing policies in the OPDC Local Plan.
56	1279	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		H8	Para 8.67	This version of the OPDC Local Plan has been drafted to be in conformity with an emerging revised London Plan. It is unclear as to why this is the case here.
110.b	1471	Community Group	Robin	Brown	Grand Union Alliance		H8		In this regard we draw attention to the expectations being placed on the currently vacant lots, known as “Bashley Road”, a case study in the 2018 Intensification Study (pages 84-87), which proposes a density of uses on that site which could have adverse consequences on the health and amenities of the adjacent traveler site. (See our response to Housing H8). Similar concerns will be expressed regarding any intensifications in proximity of Wellesley Road and the residential uses along Old Oak Lane. We note on page 96 that there was no consultation on these plans with local communities, or traveller representatives.
110.b	1526	Community Group	Robin	Brown	Grand Union Alliance		H8	8.66	Policy H8 a), 8.66: safeguarding the Bashley Road site by the OPDC and working with London Borough of Ealing to enhance is not enough. The Metal Refinery fronting Bashley Road has been the subject of the Park Royal Intensification Study and the modelled multi-storey redevelopment would be highly detrimental to the Gypsy and Traveller site. Clearly, due regard to this site’s environment, amenities, facilities and outlook have not been paid heed to.
110.b	1527	Community Group	Robin	Brown	Grand Union Alliance		H8	8.68	8.68: Although the OPDC assigns significant weight to its own draft policies when determining planning applications, it has not acted on an emerging new London Plan’s widening of the definition of gypsies and travellers for planning purposes. While, for example, the GLA’s new ‘no net loss of industrial floor space’ approach has been. The widening of the definition, perhaps, advantageous to a population marginalised and made vulnerable by society has not been actioned. This raises issues around acting reasonably, equity and equality and the OPDC’s fulfilment of the Public Sector Equalities Duty. The OPDC’s GTAA should have been reassessed, particularly in the light of the Intensification study closing down options for the enlargement and enhancement of the Bashley road site.
110.b	1528	Community Group	Robin	Brown	Grand Union Alliance		H8		It is appropriate to remind the OPDC that the Mayor is required by the GLA Acts, among other things, to promote social development and the improvement of the environment, address health inequalities and promote Londoners’ health and equality of opportunity. Economic development and the creation of wealth is only part of a wider remit. Furthermore, the emerging new London Plan has a specific policy, H16, on Gypsy & Traveller accommodation, and parts E & F require auditing existing pitches & sites and active planning to protect existing accommodation. The supporting text, for example, paras 4.16.1, 4.16.8 and 4.16.9 emphasise the current inappropriateness of accommodation, that Mayoral funding is available for new/ refurbished pitches based on an audit, and that care needs to be extended towards any relocation and re-provision.

Policy H9: Specialist Housing

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
23	130	Local Authority	Muhammed	Butt	London Borough of Brent		H9		We strongly support amendments to policy H9 which protect specialist housing where it is meeting an identified need. The OPDC SHMA identifies a need for 8,100 new specialist older person housing units during plan period. In addition, since the last stage of consultation the draft London Plan has been published and sets annual benchmarks for specialist older persons housing for Brent of 230; Ealing 200; and Hammersmith and Fulham 70. Given OPDC is part of the housing market area it is correct its Local Plan policies contribute to meeting this need through protection of existing provision in the area.
42	218	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	H9		Policy H9 b) requires developments providing 1,000 or more homes to provide 10% of homes as specialist care and supported needs housing for older people and/or vulnerable people. On OOP, this represents a requirement for approximately 650 specialist housing units, which is a significant amount and will have a detrimental impact on project viability. Whilst a small element may be appropriate, we do not consider that such a large requirement will be the best way to fund and utilise the infrastructure which will be provided in the OPDC are for the maximisation of new homes and jobs. There is no flexibility in this policy to allow its appropriate application, and so we would encourage the introduction of some flexibility to allow for a considered balancing of priorities in the delivery of major sites such as OOP. Criteria i), iii) and iv) used to assess student housing in policy H10 would be appropriate.
36	285	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		H9		The Mayor welcomes the OPDC’s intention to work with adjoining boroughs to meet the future needs of gypsies and travellers. In his draft London Plan, the Mayor has adopted a broader definition of Gypsy and Travellers than set out in Government guidance and OPDC should adopt this definition in future assessments.

Policy H10: Student Housing

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	42	Planning Consultant	Ashley	Collins	JLL	Imperial College	H10		The support given to student housing is welcomed and in particular the requirement that it be for specific higher education institutions. The OPDC rightly recognises the many positive benefits that universities/ higher education institutions and their students bring to London. However, Imperial College London objects to paragraph 8.86, which makes no distinction between higher education authorities trying to deliver accommodation for its students and schemes undertaken for profit by developers, and its requirement to deliver 35% of accommodation as 'affordable'. Imperial College London considers that the provision of affordable student accommodation should rest with the higher education institutions themselves, as they are best placed to determine the varying rents and costs that are applied across their significant portfolios, in order to ensure that the provision of student accommodation is financially sustainable in perpetuity. Imperial College London and other universities already offer a range of financial measures to help those in need.
14.b	43	Planning Consultant	Ashley	Collins	JLL	Imperial College	H10		It should also be noted that the provision of student accommodation is a benefit in itself. Not only does it help to attract the best students from around the world, which has a longer term benefit for Imperial College London and the UK, but because purpose-built student accommodation satisfies this particular area of housing need, it also frees up more traditional housing stock that would otherwise be occupied by students, thereby providing additional homes for others.
56	1280	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		H10		Should this also refer to other design standards such as adequate daylight into rooms etc? The supporting paragraphs refer to the façade, however, this is not the only design issue.

Chapter 9. Employment

Policy E1: Protecting, Strengthening & Intensifying the Strategic Industrial Location

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
36	288	Statutory Consultee	Julietta	McLoughlin	Mayor of London		E1		The Mayor also welcomes the revisions to the Employment policies, which respond to the draft London Plan policies. The objective of achieving no net loss of industrial floorspace and intensifying the use of sites (in particular on Site Allocations and on other sites identified in OPDC's Park Royal Intensification Study) has been addressed in part in new Policy E1 part b. It is suggested the text is amended to state 'no net loss of industrial floorspace capacity'. Where a landowner/applicant has reduced or cleared the site of industrial floorspace prior to making a planning application, it is suggested the Local Plan use the draft London Plan concept of industrial floorspace capacity at a 65% plot ratio. This is a measure of the potential capacity that could be delivered on low intensity or cleared industrial sites, subject to operational requirements.
113	413	Local Resident	Thomas	Dyton	WHRRRA (Member)		E1		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London to meet needs of Londoners. Already the OPDC area includes artists studios, creative businesses and prop houses and it could potentially become another Shoreditch with changing to mix-use without impacting on existing businesses. With the added benefit of Park Royal being a food production area, this would encourage vibrant cafes and shops to pop up that can be used by existing workers in the area.
93	531	Residents Association			Wells House Road Residents Association		E1		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London to meet needs of Londoners. Already the OPDC area includes artists studios, creative businesses and prop houses and it could potentially become another Shoreditch with changing to mix-use without impacting on existing businesses. With the added benefit of Park Royal being a food production area, this would encourage vibrant cafes and shops to pop up that can be used by existing workers in the area.
55	1046	Agent	Jonathan	Stoddart	CBRE	Segro	E1		In further developing the Local Plan ahead of submission, we recommend that OPDC: Explicitly acknowledges that there will be exceptional circumstance which means that the principle of achieving 'no net loss' of industrial floorspace is not appropriate and conflicts with meeting the operational needs of modern businesses.
55	1061	Agent	Jonathan	Stoddart	CBRE	Segro	E1		SEGRO strongly supports the overriding objective of Policy E1 to protect, strengthen and intensify the Strategic Industrial Location. With regards to part b) of Policy E1 and the principle of achieving 'no net loss' of industrial floorspace, whilst we support the principle of this policy approach, we believe that there will be circumstances where achieving 'no net loss' conflicts with proposals which look to provide modern industrial premises which meets the needs of modern businesses. To acknowledge such circumstances and to ensure redevelopment proposals are dealt with pragmatically, we recommend that the following supporting text is introduced after paragraph 9.9: "OPDC does however recognise that they may be exceptional circumstances where the principle of 'no net loss' of industrial floorspace is not synonymous with the broader objectives of the SIL to service London's population and businesses. Under such circumstances, a flexible approach to applying the 'no net loss' principle will need to be taken".
55	1062	Agent	Jonathan	Stoddart	CBRE	Segro	E1		Policy E1c) currently states: "provide a mix of unit sizes and in particular, small business units. Existing small business units should be re-provided;" SEGRO acknowledges that there is demand and need for a range of unit sizes within the Park Royal SIL, and this is reflected in the mix of units provided at our recent developments at Tudor and Westway industrial estate. At the same time, we also note the current abundance of small units within Park Royal, and the fact that most co-location developments to be delivered within the Old Oak area will include new small business units given the compatibility of this format with new housing. With this context in mind, we feel that the current wording for Policy E1c) is perhaps too heavily weighted towards the delivery of small business units. To provide a greater balance which reflects the development pipeline for new industrial/business space across the OPDC as a whole, and to ensure that the SIL delivers the type of industrial space which cannot reasonably function alongside housing, we recommend that the wording for Policy E1c) is amended as follows: "provide a mix of unit sizes where appropriate. Where development proposals involve the redevelopment of existing small business units, they should look to re-provide these where possible, on the premise that the existing units contribute to providing core SIL functions;".
55	1063	Agent	Jonathan	Stoddart	CBRE	Segro	E1		The supporting text to Policy E1c) should explain that the approach taken seeks to ensure that small business space is provided for across the OPDC area as a whole, and that business spaces and uses which are not entirely compatible with housing will be prioritised within the SIL.
235	1316	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	E1		Comment: This refers to intensification of sites, in particular on Site Allocations and on other sites identified in the OPDC's Park Royal Intensification Study. It is unclear whether priority will be given to those sites benefitting from a formal allocation or referenced within the Hawkins Brown Park Royal Intensification Study. Part d) of this policy (together with paragraphs 9.9 and 9.12) reference the need for Design and Access Statements and Planning Statements to articulate the extent of intensification sought on a site-by-site basis, which accords with the strategic view that all SIL sites should seek intensification. The language of intensifying all SIL sites is also used at Policy P4 at part a). Changes sought: Amend the policy requirement as follows: "b) achieve no net loss of industrial floorspace and where feasible, intensify the use of all SIL sites;"
235	1317	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	E1		Comment: The requirement to demonstrate through a Design and Access Statement that proposals are well designed for their intended purpose having regard to providing flexibility for a range of broad industrial type activities, including appropriate identified future employment growth sectors is an onerous policy test and is not justified. This will be controlled through the submission and assessment of a planning application. Changes sought: Delete this policy requirement for demonstrating ability to address future growth sectors and other future development scenarios in a Design and Access Statement.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
235	1318	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	E1	Paragraph 9.7	Comment: This states that the release of SIL in Old Oak and evidence of an accelerated loss of industrial land across London means that the remaining industrial land supply must be protected and used as intensively and efficiently as possible. Changes sought: Whilst the remaining SIL should be protected, this should not be at the expense of tenants and landowners to reallocate their buildings and sites to more productive uses if market conditions dictate. Building in flexibility to allow buildings to be re-used is a sustainable form of development.
235	1319	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	E1	Paragraph 9.11	Comment: We welcome the application of the 'agent of change' principle when considering the impact of proposals adjacent to SIL, to ensure that development will not harm the functioning of existing or future employment and industrial activities in SIL. Changes sought: No changes sought.
43	1326	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	E1		Policy E1 ii) outlines that the OPDC will protect, strengthen and intensify land within the designated SIL boundary by ensuring proposals: a) are comprised of uses suitable for broad industrial type activities as defined in Mayoral policy and/or guidance, that contribute to meeting the strategic target of 40,400 new jobs in Policy SP5 and the relevant place jobs targets in chapter 4.
43	1327	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	E1		We reiterate our comments made on Park Royal West C4 that that intensification on sites designated for SIL must not be confined to simply industrial uses on sites in close proximity to public transport in Park Royal. There is the opportunity for the OPDC to have sites that comprise industrial uses but also other employment generating uses that are not industrial but which remain complementary and compatible. Innovative approaches should be fostered and included on sites designated for SIL in conjunction with other uses as part of mixed industrial another uses, especially on sites in close proximity to public transport.
110.b	1444	Community Group	Robin	Brown	Grand Union Alliance		E1		Beyond crude 'site switching', the draft Local Plan does not have a well-considered response to draft new London Plan focus on industrial intensification and floor space provision.
110.b	1468	Community Group	Robin	Brown	Grand Union Alliance		E1		A backdrop to changes to the revisions in the Park Royal sections of the revised Regulation 19 Local Plan is the expectation expressed by planning officers in the consultation Presentation events (see slide below) that there be no net loss of industrial floor space, that Old Oak industrial floor space needs to be mostly re-provided in Park Royal and that Park Royal can be intensified. This expectation is not clearly expressed in either the London Plan or the OPDC draft revised Regulation 19 Local Plan. The relevant text in each is also listed below. Both are vague as regards the no net loss ambition in relation to SIL land: Draft new London Plan 2017: 2.1.59: "Park Royal is a strategically-important industrial estate for the functioning of London's economy and should be protected, strengthened and intensified".Draft revised Regulation 19 (2) OPDC Local Plan 2018: E1 para 9.7: " The release of SIL in Old Oak (See Figure 9.4) and evidence of an accelerated loss of industrial land across London means that the remaining industrial land supply must be protected and used as intensively and efficiently as possible". But the working ambitions of the planners as revealed in the consultation Presentation events suggest a much stronger approach, informed by the Mayor's draft new London Plan policy E4C. While it is up to the decision maker the weight that is assigned to an emerging plan, the draft new London Plan is at an early stage of evaluation and has not been examined. The weight assigned should, therefore, be slight.
110.b	1469	Community Group	Robin	Brown	Grand Union Alliance		E1		The Old Oak area of the OPDC has been identified as relevant for intensification of non-industrial development since at least the 2011 Park Royal Opportunity Area Planning Framework. Here references to pre-existing planning ambitions from nearby boroughs indicate longer standing widely known plans for this area. "Old Oak Common has recently been identified as having potential for a new west London HS2 and Crossrail interchange, which presents an opportunity for co-ordinated development at Kensal Rise CTRL. There is also potential for a Crossrail station within the Kensal Canalside OA, which is currently being promoted by RBKC through their Core Strategy. These proposals for new Crossrail stations in these areas would significantly increase accessibility and would dramatically influence the future development potential of Park Royal. These aspirations are longer term, but would result in the significant regeneration of a large area of currently underutilised railway land. This would require a rethink of the areas current designation as Strategic Industrial Land. (Park Royal OAPF, 2011, p. 2). Furthermore, the re-designation of the Old Oak area from SIL land has been anticipated throughout the OPDC planning process. The additional expectation incorporated, unexpectedly and at odds with pre-existing direction of travel of policy, into the changes of the Regulation 19 OPDC local plan, from the Mayor of London to retrospectively apply his "no net loss of industrial floor space" policy from the as yet draft new London Plan, has been interpreted for this revised Reg 19 local plan as meaning re-providing lost industrial land through intensifying land use in Park Royal. This renders the OPDC revised Reg 19 plan unsound as it departs radically from planning documents which have already acquired substantial weight in the planning system and have had material impacts on planning determinations.
110.b	1470	Community Group	Robin	Brown	Grand Union Alliance		E1		Based on evidence documents for Regulation 19 (1) Park Royal Intensification (document 33, 2017), the strategy of intensification proposed in the Regulation 19 (2) document is at odds with the evaluation of what is viable and effective for that area. It has especial consequences for small and affordable businesses, threatened by processes of intensification, led by developers who struggle to re-provide that type of common and highly valued industrial land and affordable business locations prominent in Park Royal and Old Oak. We direct your attention to p. 94 of this document, where the concerns regarding viability are summarized. The costs to developers, losses to existing businesses (notably owner-occupier businesses) is often prohibitive, and the preference of developers for low-risk, low-management, high value developments is at odds with the stated policy preferences. (See Case Study presented in our response to Employment E1 and E2) The new evidence based document regarding Park Royal intensification (evidence document 36, OPDC Regulation 19 reconsultation, 2018) does not reach a different conclusion regarding the challenges of intensification, including the high existing use values of many businesses (p. 100). However, it explores intensification on some specific sites. Here we see some of the dangers of intensification of this area, which will not only affect the loss of existing businesses as well as affordable, small and owner-occupied industrial spaces, and increase traffic, infrastructure use and demands for social infrastructure important for workplaces (eg nurseries and recreation), but will directly impact on the quality of life of residents in the area.
110.b	1473	Community Group	Robin	Brown	Grand Union Alliance		E1		In the context of competing priorities for industrial intensification, a clear priority to protecting existing jobs and businesses should be stated. Any intensification or protection of land uses in Park Royal should be prioritized to ensure that provision of "new jobs"(we note the corrections through the plan to recognize these are new and not net job figures) does not mean actual net job losses. A clear policy commitment to net job creation is needed.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
110.b	1529	Community Group	Robin	Brown	Grand Union Alliance		E1		Relocating existing businesses from Old Oak and Park Royal: A clear statement to the effect of prioritizing the re-provision of space suitable for existing Old Oak businesses in Park Royal should be placed in E1. In addition, it is not acceptable to remove net job targets and creation from the Employment chapters. A clear link between providing industrial floor space and retaining and providing employment needs to be made. Thus E1 should include a clear statement to this effect – or else the dynamics of industrial land redevelopment to high value and large scale uses will lead to a collapse of employment in the area. To illustrate, there is this example which was part of the economic landscape of Old Oak and Park Royal. The Elizabeth Arden Factory ('The Perfume Factory') at North Acton is currently being redeveloped despite it being an Existing (sic) Locally Listed Building (see draft Local Heritage Listings document consulted on earlier this year). Some 80 small businesses including significant number of artists were displaced and whilst no known systematic tracking of them has been undertaken, it is believed that most are no longer operating within the vicinity. Park Royal's vacancy rate is just 2% and rents of £17.50 per sq. ft. are being achieved (source: Capital West London online article 17th May 2018 – published by West London Alliance). Premises that are available only have 2 or 3 year leases, whereas often 10 years is necessary to secure financing to adapt/rehabilitate premises. It seems that Park Royal property owners/head leaseholders are protecting what they perceive to be gains to be made from the current approach to regenerating Park Royal by avoiding other than short term lets (source: West London Artists Studio, dukes Road, July 2018 – displaced from Elizabeth Arden Factory).

Policy E2: Employment Sites Outside SIL

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	44	Planning Consultant	Ashley	Collins	JLL	Imperial College	E2		Imperial College London supports the removal of the SIL designation from the area around the central part of Old Oak and aim of draft Policy E2 to deliver new jobs. However, it is disappointing that the focus of the policy and the supporting text is how existing industrial businesses are dealt with, with little vision of what this central area could become. Whilst the policy itself is not unsound, it is requested that it recognises there is an opportunity to create a centre of excellence for innovation, research & development, life sciences, medical and high-tech businesses, which would help make the economic proposals for Old Oak be a success for the benefit of West London and indeed the capital as a whole.
23	120	Local Authority	Muhammed	Butt	London Borough of Brent		E2		The Council also notes policy E2 has been amended to focus on employment sites outside of Strategic Industrial Locations (SIL) and includes new criteria to allow employment sites to be redeveloped to other uses where it is shown they are no longer economically unviable. Whilst we do not object to the principle of this approach, we feel the requirement of marketing evidence for a period of 12 months is not sufficient. Twelve months does not allow for a robust marketing exercise or for localised short term fluctuations in demand. Brent, as with the majority of Local Planning Authorities, requires demonstration of active marketing over a period of 24 months, and would recommend the OPDC Local Plan applies the same approach.
23	122	Local Authority	Muhammed	Butt	London Borough of Brent		E2	d)	For the Plan to be sound Brent Council is seeking policy E2: Employment Sites Outside of SIL to be amended as follows: (Deleted text struck through, new text underlined) "d) involve the change the <u>of</u> use of employment floorspace to other land uses, where it is shown to no longer be economically viable, as demonstrated by accounts data and through competitive marketing for a period of at least 12 <u>24</u> months for relevant employment uses without an appropriate offer being received."
42	219	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	E2	b)	Part b) of this redrafted policy requires new development to seek to incorporate existing businesses where possible. Whilst we recognise and appreciate the ambitions behind these requirements, and welcome part i) of this policy which could feasibility conclude that there are no existing businesses that it is feasible or desirable to retain, the Opportunity Area designation does signal a fundamental change to the nature of the area. This means that many existing businesses are unlikely to be compatible with the new vision for the area. In order to fund the significant amounts of infrastructure required to deliver the new homes and jobs targets, residential and commercial values will need to rise and developers funding the provision of infrastructure will need to be allowed to deliver new floorspace that achieves the step change in values necessary to fund this infrastructure. We strongly object to part c) of this policy, which requires a developer to 'support' 'any' existing businesses to relocate off-site. This is an onerous requirement and places additional commercial burden on the landowners in the OPDC area, restricting their ability to make commercial transactions with their tenants.
42	220	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	E2	9.18	The requirement to provide a Business Relocation Strategy at 9.18 is unduly onerous. We object to the specific requirement to ask existing businesses during the pre-application process whether they wish to remain, and if they do, ensure that any new scheme can be designed to accommodate them. As noted above, the aim of the Local Plan is to deliver a step change in land use, density and values in the area to enable the delivery of a new residential-led town centre. It is inappropriate to require landowners to provide this level of support to a tenant, as it comprises their commercial rights and contradicts the designation of the site for non-industrial uses. The details of relocating businesses to secure the area's redevelopment (including details of lease arrangements) is a private commercial matter and should not form a requirement of the Local Plan or require landowners to share commercial details. Requiring this amount of process and detail from applicants could stifle development of key sites and goes beyond the statutory obligations of a landlord to their tenants. We consider that these requirements should be removed or significantly reduced, and these matters dealt with by OPDC outside of their planning function. If this does remain a requirement, then the additional cost and opportunity cost resulting from this policy requirement would need to be accounted for in any viability appraisal.
36	289	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		E2		The concern at Regulation 19 over making provision for existing businesses including relocation arrangements where needed has been addressed in new Policy E2 parts b and c and in supporting text.
110.b	1530	Community Group	Robin	Brown	Grand Union Alliance		E2		It is not enough to demonstrate 'no net loss of industrial floor space', as required by the draft new London Plan, which has driven the Intensification Study and the resulting changes to policy, but to have a suite of policies and proposals that deliver regeneration sensitive and appropriate to the businesses and functions of Old Oak and Park Royal. Addition to Policy E1 and amendment to Policy E2: Thus we propose the following amendments: E1 b) add to "achieve no net loss of industrial floor space" no net loss of jobs "and where feasible, intensify the use of sites, in particular on Site Allocations and on other sites identified in OPDC's Park Royal Intensification Study"; then add Re-provide suitable premises for all existing businesses from across the OPDC area as a priority in any redevelopment in Park Royal.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
110.b	1531	Community Group	Robin	Brown	Grand Union Alliance		E2		The current statement in E2 (b) and (c) should be strengthened, and reflected in the overall policy of E1. For example: add to E2 c) "support any existing businesses that cannot be incorporated in line with part b) to relocate off site" with priority to re-provisioning (re-providing) within the Park Royal area.

Policy E3: Supporting Small Businesses and Start Ups

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	45	Planning Consultant	Ashley	Collins	JLL	Imperial College	E3		The principle of supporting small businesses and start-ups goes to the heart of much of what Imperial College London does, in order to translate some of its research so that it actually benefits society. Imperial College London invests considerable amounts of energy and resources into fostering new businesses and has had considerable success with delivering more spin-out companies than any other UK university, with over 140 having been created during the last 10 years. However, it objects to the requirement for a quantum of this to be offered at rents below that charged to others. This is not justified and places an additional burden on development proposals. It is unacceptable for the following reasons:
14.b	46	Planning Consultant	Ashley	Collins	JLL	Imperial College	E3		1. There is no market failure that needs to be addressed by this planning policy. There are a wide range of business unit sizes, locations and prices available in West London.
14.b	47	Planning Consultant	Ashley	Collins	JLL	Imperial College	E3		2. Unlike affordable housing, where there is a specific social need to help those who are less fortunate, businesses do not have the same social needs.
14.b	48	Planning Consultant	Ashley	Collins	JLL	Imperial College	E3		3. The policy would not be workable in practice. For example, who would decide when a business has become 'too successful' to be allowed to occupy such accommodation. It is clearly counter-intuitive for those businesses which are successful, to then be penalised by having to move out of their accommodation.
14.b	49	Planning Consultant	Ashley	Collins	JLL	Imperial College	E3		4. All subsidised employment space distorts the market, giving an unfair advantage to businesses who benefit from it compared with those that do not. Related to the point above, it also provides a perverse disincentive for a business to succeed and it is not in the interests of the economy to focus resources on weak businesses.
14.b	50	Planning Consultant	Ashley	Collins	JLL	Imperial College	E3		5. The requirement proposes an additional cost on business developments and 'taxing' them in this way will not only reduce the amount of business space that comes forward, but will also make it more expensive for companies who occupy the unsubsidised space.
14.b	51	Planning Consultant	Ashley	Collins	JLL	Imperial College	E3		It is recognised that the draft London Plan is bringing forward a similar policy. Imperial College London has objected to this as well, on the same grounds and the draft policy position does need to be re-thought.
23	119	Local Authority	Muhammed	Butt	London Borough of Brent		E3		Overall, Brent Council is supportive of policies in the employment chapter. However, we maintain that for the reasons outlined previously, clarification is required in policy E3 or supporting text as to what constitutes 'an appropriate quantum' of affordable workspace. Brent is concerned without further defining what constitutes an appropriate quantum, or what criteria will be considered in determining this, affordable workspace may not be secured. Brent Council believes this aspect of the Plan is unsound on the grounds it is not positively prepared.
23	121	Local Authority	Muhammed	Butt	London Borough of Brent		E3		A similar approach should be taken as with affordable housing, where a target is set for the proportion of low cost workspace to be provided, informed by the whole plan viability assessment. Brent Council welcomes further discussions as to how the Section 106 SPD will set out an approach to calculating off site contributions.
42	221	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	E3	9.23	We do not consider it necessary for the OPDC to require at 9.23 its approval of workspace and studio providers. The cost of any capped rents as a discount to market rents will need to be accounted for in any viability appraisal.
113	412	Local Resident	Thomas	Dyton	WHRRRA (Member)		E3		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure the area has retains and enhances its personality. Here is required a stronger commitment to re-provisioning of affordable studio and office space, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure re-provision can be ensured.
93	530	Residents Association			Wells House Road Residents Association		E3		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure the area has retains and enhances its personality. Here is required a stronger commitment to re-provisioning of affordable studio and office space, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure re-provision can be ensured.
55	1047	Agent	Jonathan	Stoddart	CBRE	Segro	E3		In further developing the Local Plan ahead of submission, we recommend that OPDC: Remove the requirement for affordable workspace within Policy E3 and clarifies the intended interpretation and application of the policy.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
55	1064	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>Policy E3: 'Supporting Small Businesses and Start Ups' states that the OPDC will require proposals which generate new employment floorspace to:</p> <p>a) incorporate an appropriate quantum of;</p> <p>i. affordable workspace offered at below market rate;</p> <p>ii. shared workspaces; and/or</p> <p>iii. small business units</p> <p>b) demonstrate that any affordable workspace provided under part a) would be managed by an appropriate workspace or studio provider and/or be supported by an appropriate Management Scheme; and</p> <p>c) demonstrate that the affordable workspace delivered provides an appropriate security of tenure.</p> <p>In terms of our interpretation of Policy E3 and how it will be applied, we have two main concerns:</p> <ul style="list-style-type: none"> • The current wording of the policy wording does not make it clear how the policy is expected to be addressed – i.e. whether it is a mix of all or some of the types of space listed, or a selection between them. OPDC officers have confirmed that it is for the applicant to determine what format(s) they believe is most appropriate for each development proposal. Such flexibility is supported, but the policy and/or supporting text needs to clarify that this is how it should be applied. • Reference to an 'appropriate quantum' is very vague and gives developers very little certainty as to the OPDC's target requirements regarding the mix of spaces. <p>Policy E3 identifies three means of supporting small businesses and start-ups: small business units, share workspace and affordable workspace. Our response to these is provided in turn below.</p>
55	1065	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>Small business units</p> <p>As mentioned in our previous representations, which are appended for reference, we provide a range of unit sizes within our industrial estates. In many cases this includes the provision of small units (defined by OPDC as <500 sqm) as referenced in a)iii, which can support small businesses and start-ups. We therefore support part a)iii of Policy E3.</p>
55	1066	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>Shared workspaces</p> <p>We have extensive experience of developing space for industrial occupiers, and have detailed knowledge of new trends and innovations within the market. Whilst 'shared workspaces' might be appropriate in offices, such spaces are not appropriate for new industrial occupiers and there is no indication within the market that this is likely to change.</p>
55	1067	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>As stated in our previous representations, we have serious concerns about the requirement for affordable workspace in new developments given the likely adverse impacts of this on management processes and development viability. Whilst we have supported the provision of space for small businesses, these units have always been leased at a market facing rental level. The attractiveness of these schemes for potential occupiers is the:</p> <ul style="list-style-type: none"> • Flexibility and all-inclusive lease terms • Provision of a high quality, modern industrial space • High level of on-site management support • Safe and secure environment
55	1068	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>At SEGRO Park Rainham we have developed an Enterprise Quarter that includes 44 small units (552 sq. ft – 3738 sq. ft) which are provided on the basis above but this scheme was only deliverable through a joint venture partnership with the GLA as the land owner. The plan does not suggest that the provision of affordable workspace will be partially funded/supported by the OPDC. Our comments on Policy E3 are therefore made on the basis that affordable workspace will be entirely supported by the property sector. To deliver affordable workspace we believe the OPDC will be required to provide practical/financial commitments to support this policy objective.</p>
55	1069	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>Having reviewed the plan's evidence base, we have observed very little by way of evidence that there is an identified need for affordable workspace; that it is deliverable; and that it has known and measurable benefits.</p> <p>Furthermore, the Whole Plan Viability Study (June 2018) has been prepared to assess the viability impact the policies included in the plan, as per the NPPF requirement and associated guidance. The study analyses the impact of providing an element of affordable B1 space (equivalent to 10% of the total B1 space) within mixed use schemes, and concludes that the policy has a material negative effect on development viability. The study does not however assess the viability impact on industrial development, either entirely industrial or mixed use, and so its application has not been fully considered.</p>
55	1070	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>Finally, the supporting text to Policy E3 suggests that the London Plan will provide the detail regarding affordable workspace requirements, including quantum, rent level etc. This is problematic since the adopted London Plan does not include affordable workspace policies, and the draft London Plan does not include these details, and in any event has not been tested through examination and is subject to a number of substantial objections relating to affordable workspace policy.</p>
55	1071	Agent	Jonathan	Stoddart	CBRE	Segro	E3		<p>Overall, we do not consider Policy E3 to be justified or effective. For the plan to be considered 'sound', as per the NPPF, we recommend the following changes are made:</p> <ul style="list-style-type: none"> • The intended flexible application of the policy to be made explicit • An 'appropriate quantum' to be defined – e.g. a target of X%. • References to affordable workspace to be omitted. • Clarification to be incorporated to make clear that shared workspaces are not appropriate for all workspace typologies.
56	1281	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		E3		<p>LBHF support Policy E3 which requires proposals that generate new employment floorspace to provide a quantum of affordable workspace which is offered below market rates.</p>

Policy E4: Work-Live Units

No comments

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

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
47	605	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		E5		We support the OPDC's ambition to maximises access to employment, skills training and pre-employment support. (Policy E5). We reiterate our view that the supporting text to the policy should be explicit that these opportunities should be available to those living within neighbouring borough, borough's such as ours, as well as those within the ODPC boroughs.

Chapter 10. Town Centre and Community Uses

Policy TCC1: Locations for and Impacts of Town Centre Uses

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
23	107	Local Authority	Muhammed	Butt	London Borough of Brent		TCC1		<p>Harlesden District Centre - TCC1: Locations for and Impacts of Town Centre Uses and TCC3: A-Class Uses (previously TCC2, P1, P2 and P11)</p> <p>Brent Council objected to policy TCC2 (now TCC1 and TCC3) on the grounds it did not give any certainty mitigation will be secured for Harlesden District Centre, despite this being a recommendation in the OPDC Retail and Leisure Needs Study. This was in light of findings that Old Oak Major Centre will draw trade from Harlesden District Centre and if not carefully managed could detrimentally impact on the centre.</p> <p>Since the OPDC Local Plan was last subject to consultation the Council has commissioned an updated Retail and Leisure Needs Study. The study has identified that Harlesden has a low comparison goods sales densities at £2,669 per sq.m. A strong performing centre would be expected to have a comparison goods sales density of c. £5,000 per sq.m at least, and therefore Harlesden is underperforming in this respect (by way of contrast – the aggregate comparison goods sales density for the Kilburn / Cricklewood / Willesden area is £5,085 per sq.m). Further diversion of comparison goods spend away from the centre will serve to reduce these sales densities further. Furthermore, the OPDC Retail and Leisure Needs Study focussed on potential impacts from Old Oak and did not consider cumulative impacts including from the Brent Cross expansion. Findings indicate Brent Cross has a strong influence over comparison goods spend across the borough, with trade draw of 20-29.99% from Harlesden. A planned extension to Brent Cross will deliver a further 2million sq. ft of retail and leisure space. Findings from the Brent Retail and Leisure Needs Study indicate cumulatively trade draw will be greater than that identified in the OPDC study, further emphasising the need for mitigation.</p> <p>In light of the above, we welcome amendments to supporting text to policy TCC1 giving greater certainty financial contributions will be secured by removing the word 'potential'. However, we would seek this is reflected in the wording of policy TCC1 by removing the requirement for financial contributions only 'where appropriate.' Policy TCC1 already includes criteria which defines where contributions will be appropriate, therefore this wording is unnecessary.</p>
23	108	Local Authority	Muhammed	Butt	London Borough of Brent		TCC1		<p>We also note supporting text no longer requires developers to provide individual Harlesden Enhancement Strategies, but instead contributions will be secured following engagement with Brent Council and OPDC. This clarity is welcomed. Harlesden is one of Brent's priority town centres and has a dedicated Town Centre Manager who is taking forward an action plan to help secure its long term viability. As previously stated, it will be important for improvements to be co-ordinated through the Harlesden Town Centre Manager to ensure a joined up approach to mitigation. To give both the Council and developers certainty details are needed of how financial contributions will be calculated, and the Council seeks a commitment this will be included in the emerging Section 106 SPD. The emerging Harlesden Town Centre Action Plan should help form the basis of calculating contributions.</p>
23	109	Local Authority	Muhammed	Butt	London Borough of Brent		TCC1		<p>We uphold our objections to the proposed threshold for financial contributions of 5,000sqm for development containing major town centre uses within Old Oak Major Centre and 2,500sqm outside of the centre. The OPDC Retail and Leisure Needs Study identifies that the majority of surrounding boroughs have far lower thresholds for impact assessments but justifies a higher threshold for Old Oak on the grounds 'higher thresholds are more appropriate for sites competing primarily with larger centres.' However, as the study identifies due to its proximity Old Oak Major Centre will draw trade from and therefore compete with Harlesden District Centre. It goes on to state 'we consider that it will be most at risk from much larger developments and it is not expected that small developments will compete significantly with Harlesden.' Harlesden has under 10,000sqm of comparison goods floorspace and approximately 21,000sqm of total retail floorspace. In this context, and where the largest comparison retail unit is a 660sqm Argos and the largest convenience unit a 1,150sqm Tesco, 5,000sqm is a large retail development which could compete significantly with Harlesden. Furthermore, the proposed boundary for Old Oak Major Centre in figure 10.3 of the Local Plan covers the majority of Old Oak North. It is understandable that in the absence of an existing town centre a degree of flexibility is sought, however, this means that the majority of Old Oak would be considered in centre development which gives little to safeguard Harlesden or other surrounding centres.</p>
23	110	Local Authority	Muhammed	Butt	London Borough of Brent		TCC1		<p>In addition, under the proposed policy there is potential for out of centre development to cumulatively total in excess of 5,000sqm without being required to contribute to mitigation. It is welcome that the June 2018 addendum of the Retail and Leisure Needs study in paragraph 3.5.7 recognises 'with reference to the PPG's advice that setting locally appropriate thresholds should have regard to the 'cumulative effects of recent developments', it may be appropriate to consider imposing a lower impact threshold as development comes forward in the OPDC area and the on-the-ground effects on the existing and proposed hierarchy of centres become apparent.' However, if the threshold is only lowered once on-the-ground-effects are apparent it will be too late to address any negative impacts on the vitality and viability of the town centre network. It is therefore considered as a maximum the threshold should be 2,500sqm, reflective of the default standard in the NPPF.</p>
23	112	Local Authority	Muhammed	Butt	London Borough of Brent		TCC1	f) g)	<p>Change Sought</p> <p>For the Plan to be sound Brent Council is seeking policy TCC1: Locations for and Impacts of Town Centre Uses to be amended as follows: (Deleted text struck through, new text underlined)</p> <p>"f) should be supported by an impact assessment in accordance with the NPPF and NPPG, where proposals are providing retail, leisure or office development that exceeds <u>2,500sqm the thresholds in e), and ii.</u>; and</p> <p>g) should contribute, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Town Centre, when providing town centre uses that exceed <u>2,500sqm the thresholds in e), and ii.</u>"</p>
42	222	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	TCC1	10.21	<p>10.21 requires the provision of a Town Centre Uses Statement, which should include how it is proposed to manage the retail uses. We do not consider that this information is relevant or appropriate, nor is it information that is likely to be known at the planning application stage.</p>
36	278	Statutory Consultee	Juliemma	McLoughlin	Mayor of London		TCC1		<p>At the first Regulation 19 stage, the Mayor indicated that support for town centre uses in the Strategic Industrial Location as set out in draft policy TCC1 was not in conformity with the London Plan. The revised policy TCC1 places a size limit on floorspace and limit on clustering, and these changes are welcome. I can confirm that the OPDC Local Plan is in general conformity with the London Plan.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
217	376	Local Resident	Jean	Lewis			TCC1	10.7	"10.7 OPDC acknowledges that small-scale walk-to town centre uses can help manufacturing businesses in Park Royal that may wish to sell their produce on their premises, help to serve the needs of workers. OPDC recognises the benefits that this might bring to the viability of Park Royal's businesses and help to improve the character and vibrancy of the area. ... Any such uses should be small-scale, consisting of no more than 80sqm, which is defined as the threshold for small units in OPDC's Retail and Leisure Needs Study." JL: This appears to be a positive contribution to the area.
217	377	Local Resident	Jean	Lewis			TCC1	10.8	"10.8 In early development phases, meanwhile uses will play a critical role in providing services to communities and in place making and proposals for meanwhile town centre uses will be supported, where they accord with the requirements set out in Policy TCC9." JL: This appears to be a positive contribution to the area.
217	378	Local Resident	Jean	Lewis			TCC1	10.9	"10.9 The OPDC area is relatively unique in that the designated town centres at Old Oak, North Acton and Atlas Junction either do not yet exist or are at a very early phase of their development. To ensure that the growth of these centres is carefully managed, OPDC will require development proposals that meet the relevant thresholds to include within their Planning Statement a Town Centre Uses Statement. The Town Centre Uses Statement should include: a) a vision statement, explaining the rationale and intended market profile of the development, including plans for how it will be presented to the market and its long-term management (for example, there might be a single entity managing the asset in a similar way to Covent Garden, Marylebone High Street or Regent Street)." JL: This may appear attractive in several senses but the trend for public spaces to be managed by a single entity is that they are so tightly managed, with numerous restrictions, that they no longer appear to be public spaces. In fact they are no longer public spaces because they are privately owned and managed.
217	379	Local Resident	Jean	Lewis			TCC1	10.11	"10.11 Harlesden is the closest town centre to the OPDC boundary. The centre is designated as a District Town Centre. OPDC's Retail and Leisure Needs Study shows that due to its scale and proximity, the centre is likely to be the most impacted by the new town centre hierarchy within the OPDC area. There will be significant opportunities for Harlesden to try and capture trade from the new population and there is also a need to ensure that any risks to the functioning of the centre are appropriately mitigated. To explore and support opportunities for the centre, schemes caught by the relevant threshold will need to engage early with OPDC and the London Borough of Brent to consider, where required, contributions to measures that would potentially support the continuing viability and viability of the centre. This should include, where relevant: a) details of how proposed links with Harlesden would be designed, delivered and their timescales; b) financial contributions to measures that would mitigate any identified significant adverse impacts to the centre." JL: I think there is a typing error and one should read 'vitality'. How will Harlesden small businesses and residents be able to work with LB Brent to influence these particular developments?
217	380	Local Resident	Jean	Lewis			TCC1	10.11	How will Harlesden small businesses and residents be able to work with LB Brent to influence these particular developments?
47	606	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		TCC1		We continue to support the OPDC's ambition of focusing town centre uses within the designated town centres. Such an approach will enable the success of these centres, helping give the focus that the area requires.
28	712	Strategic Partner	Lucinda	Turner	Transport for London		TCC1	Figure 10.3	TfL requests that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period. This comment is also relevant to a number of other figures in the document e.g. Figure 3.7, 3.15, 10.3
110.b	1532	Community Group	Robin	Brown	Grand Union Alliance		TCC1		Policy TCC1: Following on from the opening of this policy, in para 10.11 it is recognised that Harlesden Town Centre is likely to be impacted by the OPDC's town centre plans. We stress the need that significant measures should be actioned/ funded to remedy adverse impacts. These measures should be first agreed with organisations that represent local businesses, such as Harlesden Town Team, Harlesden Neighbourhood Forum etc. and not only the local Council. However, impacts will not only be around competition for trade. Concern that if limitations are place up on the number and location of those outlets that have 'negative health impacts', such as betting shops etc., within the OPDC area then these, to serve the growing population will gravitate to the surrounding centres to their detriment and that of the surrounding communities.
110.b	1533	Community Group	Robin	Brown	Grand Union Alliance		TCC1	10.7	Paras 10.7 & 10.8: facilitating the showcasing and retail sales of locally produced products and services and supporting 'meanwhile' uses, including 'pop-up markets' would be a positive contribution to the vitality and vibrancy of Old Oak and Park Royal.
110.b	1534	Community Group	Robin	Brown	Grand Union Alliance		TCC1	10.9	Para 10.9: Single entity management may appear attractive but these can so tightly managed, with numerous restrictions, that they no longer appear and function as public spaces. In fact they are no longer public spaces because they are privately owned and managed.
120	1626	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		TCC1		HNF welcomes the additional references to supporting Harlesden town centre (TCC1 (g) and the supporting text, although this seems to potentially be at variance with policies of continued support for SIL land at sensitive transition points around Willesden Junction Station. Whilst not specifically mentioned in the plan, the HNF looks forward to more detailed proposals for Old Oak North being published later this year.

Policy TCC2: Vibrancy

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	223	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	TCC2	E)	Policy TCC3 e) requires 10% of retail to be in small, preferably more affordable, units of no more than 80sq m. Whilst we support the broad aims of this policy, we do not think that it is helpful or necessary to stipulate percentage targets. Part e) of the policy does state that the smaller units should be focused on 'secondary retail frontages', however as these are not defined in the Plan, the impact of this cannot be determined, and we consider that it is likely to unduly constrain the commerciality of the new town centre, and could limit developer's flexibility in securing tenants. We would suggest that it would be helpful to identify the primary and secondary retail frontages – even if this is by defining characteristics rather than specific streets.
110.b	1535	Community Group	Robin	Brown	Grand Union Alliance		TCC2	10.11	Para 10.11: Typo whereby viability is duplicated in the same phrase. Vibrancy and vitality should be used here alongside viability.

Policy TCC3: A-Class Uses

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
23	111	Local Authority	Muhammed	Butt	London Borough of Brent		TCC3		The Council previously objected to the omission of the retail floorspace thresholds in the Retail and Leisure Needs Study from policy wording. Policy TCC3 continues to state developments should have regard to the thresholds. This wording is considered insufficiently strong, as it would not prevent development coming forward which exceeds the thresholds and therefore be detrimental to vitality and viability of the wider town centre hierarchy. It brings into question the value of having a Retail and Leisure Needs Study if its recommendations do not inform policy wording, and instead levels of town centre development are tested on an ad-hoc basis at planning application stage. Brent Council believes this aspect of the Plan is unsound on the grounds it is not consistent with national policy, positively prepared or effective.
23	113	Local Authority	Muhammed	Butt	London Borough of Brent		TCC3	b)	For the Plan to be sound Brent Council is seeking policy TCC3: A-Class Uses to be amended as follows: (Deleted text struck through, new text underlined) "b) proposals for new A-class floorspace to have regard to <u>be reflective of and not cumulatively exceed the thresholds set in the most up to date retail and leisure needs study for the OPDC area including the recommended distribution of A-Class uses across the area;</u> "
217	381	Local Resident	Jean	Lewis			TCC3	10.2	"10.20 OPDC will expect primary shopping areas (which can be viewed on OPDC's Policies Map) to be predominantly made up of retail premises (Use Class A1), but will take a more flexible approach to the delivery of town centre uses outside of these primary shopping areas, in recognition of the diverse and vibrant mix of uses that can help support the vitality of OPDC's town centre network." JL: This appears to be a positive change to the plan but how can local businesses and residents influence this, as plans progress?
47	607	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		TCC3		We do not object to the scale of the A class floorspace being proposed within the OPDC's area. Having had regard to the Retail and Leisure Needs Study prepared by PBA we are satisfied that the quantum of A class uses proposed is such that it will largely serve the needs of those living, working and travelling through the Old Oak area. As such, we are satisfied that as drafted, the quantum of A class floorspace being proposed is unlikely to have a detrimental impact on the existing centres within the Royal Borough.
56	1282	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC3	c)	We endorse the change in Policy TCC3 (c) which introduces a quota for at least 50% of the Primary Shopping area to be in A1 class uses. This takes out the ambiguity of stating that these areas would comprise of "predominantly" A1 units as stated in the previous draft.
56	1283	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC3	e)	We support this approach of securing at least 10% of floorspace for units of 80 sqm or less on applications that include more than 1,000 sqm of retail floorspace to ensure a variety of needs can be met including those that are affordable and may appeal to smaller independent retailers.

Policy TCC4: Social Infrastructure

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
204	18	Local Resident	Anita	Ringsell			TCC4		We also do not want our local hospitals Central Middlesex, Ealing, Charing Cross and Hammersmith turned into Healthcare Centres. We need to keep our hospitals and the A & Es should be reopened that were closed down. This is also an industrial area and many people work here and there is a need to have the necessary hospitals in the area in case of minor or major incidents. There should also be Maternity Services provided within the local hospital again as there are many people coming into the country who need this facility.
205	26	Local Resident	Theresa	Magee	Wesley Estate Residents Association		TCC4		I attended the public consultation on the seconded revised draft local plan on 12th JULY 2018. My thought are coming from a long time residents prospective. I welcome the proposed expansion of Central Middlesex Hospital medical facilities. I think a dentist and perhaps a baby clinic would also be an added bonus. The reopening of the A&E would be a real bonus, in a prominently industrial area , so close to the A40, A406 NORTH CIRCULAR ROAD AND ALSO THE MI , where accidents have happened in the past, and may happen again, it would not only useful but highly necessarily .

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
23	123	Local Authority	Muhammed	Butt	London Borough of Brent		TCC4		Brent, Hammersmith & Fulham and Ealing Councils previously jointly raised concerns in relation to the Education and Health Needs Study which formed part of the evidence based for the Local Plan. The main concerns focussed around assumed capacity in existing schools and their potential to expand, as these assumptions had not been subject to feasibility work or agreed with the Local Education Authorities. Subsequently, the Councils met with the OPDC to find a way forward. Whilst this engagement was welcomed we feel it is important it is sustained. Following the meeting the OPDC circulated a list of revised assumptions on which to base an updated assessment of education needs. The Council made comments on these proposed assumptions by email on 12th April 2018. The points raised have not been fully addressed in the updated education needs work and we request an explanation of why. In summary we sought the following:
23	124	Local Authority	Muhammed	Butt	London Borough of Brent		TCC4		1. Social Infrastructure Needs Study, paragraph 2.5.2: 'The affordable housing tenure mix reflects a blend of 25% Affordable Rent (social rent), 37.5% London Living Rent and 37.5% Intermediate Housing (shared ownership)'. Given the boroughs' objections to affordable housing policy H2, we sought sensitivity testing on the basis of 60% Affordable Rent and 40% Intermediate. It is noted the study has assumed 25% Affordable Rent, which is below the threshold proposed in the Local Plan of 30%. The implications being the child yield will be reduced.
23	125	Local Authority	Muhammed	Butt	London Borough of Brent		TCC4		2. Social Infrastructure Needs Study, paragraph 3.3: 'When choosing between stand-alone nurseries and nursery provision in schools, the take-up of school nursery places is 76%. This is because families tend to only send their child to a school nursery if they plan to send them to the reception class afterwards and school nurseries do not work for all families because of the opening hours.' In our experience, families send their children to a school nursery for a range of key reasons, including quality and proximity. Some families believe that they will secure a reception place for their child by sending them to the nursery in that school, but this is a mistaken belief and one that we in Brent are seeking to ensure is dispelled as widely as possible. The fact that some parents choose school nurseries for this reason should therefore not be used as a basis for determining demand and supply of different types of early years provision. Furthermore, there are local variances, for instance in Brent, take-up is approximately 50%-50% across maintained (school nurseries) and private (nurseries, childminders and independent schools) early years provision. New initiatives such as the 30 hours free childcare entitlement being offered by schools means that parents can now have longer hours in the maintained sector too and so reduces the difference between what the maintained and private sectors offer.
23	126	Local Authority	Muhammed	Butt	London Borough of Brent		TCC4		It is also noted that the study states there is sufficient capacity available in primary schools to meet needs arising from phases 1 and 2 of the Local Plan period, and that 'the Local Education Authorities (LEAs) have identified the existing schools that may have the potential for off-site expansion to meet the needs of the development in early phases (refer to Section 4.6 and Appendix B.1)'. These sections do not provide further details on where this capacity is. Brent has advised due to increasing housing targets and development pressure it cannot confirm capacity will be available. Therefore clarification is sought as to which Local Education Authority has agreed capacity and to school expansions.
23	127	Local Authority	Muhammed	Butt	London Borough of Brent		TCC4		Analysis of our current on-roll data shows that approximately 85% of Brent residents attending Brent primary schools have chosen to attend a school within 1 mile of the family home. If this trend continues with residents living on the new OPDC development, it is likely to place additional pressure on schools closer to the southern Brent border and may reduce availability of places for children who live further north of those schools. Furthermore, we have already indicated that pressure on secondary places across Brent is forecast to grow over the next 7 years which will require an increase of capacity to ensure we continue to provide enough school places for our own residents. Brent Council believes this aspect of the Plan is unsound on the grounds it is not positively prepared as it fails to meet the infrastructure needs of the development.
23	128	Local Authority	Muhammed	Butt	London Borough of Brent		TCC4		Although it is appreciated feasibility work will be on-going, we request confirmation as to which Local Education Authority has in principle agreed to school expansions and to provide capacity. We would also seek a response to our detailed comments made on the assumptions which have informed the study, and where needed further modelling/sensitivity testing.
23	129	Local Authority	Muhammed	Butt	London Borough of Brent		TCC4		We would also request that decisions around the type of early years provision required are re-visited in light of our comments and have an equal mix of maintained and private provision to ensure that families have a choice.
76.b	179	Strategic Partner	Duncan	Green	Diocese of London		TCC4		4. It would be great to have community hubs and spaces managed by the local authority and/ or multiple local stakeholders in order that it remains low cost, not for profit and readily available for community projects. Our initial concern is that if the 'private sector sponsorship' is too great, access may quickly become unaffordable, too regulated and inaccessible for local community. Thus far, the Social Infrastructure report states (10.4) that there will need to be: 'innovative approaches to funding such as private sector sponsorship and the community ownership and management of assets (see Policy DI3). Where necessary and feasible, OPDC will also secure planning contributions towards the management and maintenance of facilities from developers.'
76.b	180	Strategic Partner	Duncan	Green	Diocese of London		TCC4		5. We are very grateful and appreciate that mentioned in the social infrastructure section of the report is the need for 'Places of Worship' to be provided for with long leases, at low cost. However, we would also like to note that it would be difficult for many, if not all, faiths to have to simultaneously share one space. What would be preferable is that each faith requesting space be allocated their own space for its sole use for the duration of the lease.
42	224	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	TCC4		We welcome the slight reduction in the scope of social infrastructure that the Plan allocates for OOP, but still have some reservations about the scale of requirements. We continue to consider that a 2/3FE primary school will be sufficient and that a 4FE primary school is too large and will be challenging to accommodate without a significant impact on the design and density of development at OOP. The supporting Education and Health Needs Study suggests that this could extend to 0.58ha, which is larger than our emerging masterplan allows for. This view is informed by our consideration that it will be very challenging for the scheme to deliver close to the 50% affordable housing target, and that the target for 25% of new homes to be family homes is too high. Reducing both of these elements of the development at OPDC will reduce the likely child yield.
42	227	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	TCC4	C)	TCC4 c) and 10.50-51 talk about swimming pools and tennis courts, but suggests they can be private facilities with concessionary access to "those on lower incomes, and families with young people and children". Reference is made to Fulham Pools, which were built by a gym operator as part of a wider fitness centre, but with free public access to the pool. This may be possible, but is unlikely until the area has built out a lot more.
42	228	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	TCC4	E)	TCC4 e) and 10.40 suggest that ongoing revenue funding may be sought from developers for social infrastructure in addition to capital funding. This is an unusual and onerous suggestion, and goes beyond the limitations of planning obligations. We request that this is removed from the Plan.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
217	361	Local Resident	Jean	Lewis			TCC4	10.28; and 10.32	P299 Social Infrastructure "10.28 OPDC's Social Infrastructure Needs Study (2018) outlines the approach to the provision of education, health, community and emergency service facilities in the OPDC area. 10.32 In respect of health, the modelling shows the on-site need for space within the Local Plan period is for approximately 1,564sqm of on-site health facility space. The Local Authorities and Clinical Commissioning Groups (CCGs) have confirmed that the preferred approach for the delivery of this floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. The Social Infrastructure Needs Study has assessed the on-site needs for this facility, which shows the need for this facility within the Cargiant site allocation, based on current projections." JL: I agree that one building is preferable for more effective healthcare provision but adequate pick up and drop off facility is essential because many users of services at the health centre cannot use public transport due to physical disability.
217	362	Local Resident	Jean	Lewis			TCC4	10.33	"10.33 In respect of community space, modelling shows the need for two community hubs, each of 2,600sqm. The community hubs should provide for a variety of community facilities and could include facilities such as public toilets, a community café, faith space, youth space and halls for hire. Current modelling shows that one of these community hubs should be located in Old Oak North (P2) and the other in Old Oak South (P1). The Social Infrastructure Needs Study also identifies a need for on-site emergency service provision." JL: Facilities need to be heavily discounted for inclusive community use. In addition to halls for hire, more permanent space is required for young people, older people and voluntary organisations/charities. I understand that voluntary groups will need to work with housing associations to secure community space but how will the Local Authority support and facilitate appropriate negotiations for such space?
217	363	Local Resident	Jean	Lewis			TCC4	Para 10.40	JL: The following is not a new addition but worth mentioning: "10.40 Reductions in funding have made it more challenging for service providers to maintain and operate social infrastructure facilities. These costs can in part be reduced through co-locating facilities, but OPDC will also need to work closely with service providers to consider appropriate funding sources for both the existing and new community facilities in the OPDC area. This will include innovative approaches to funding such as private sector sponsorship and the community ownership and management of assets (see Policy DI3). Where necessary and feasible, OPDC will also secure planning contributions towards the management and maintenance of facilities from developers." JL: Reliance on the private sector is a very worrying proposition with clear conflict between profit and 'affordability'. Commitments made at the outset of the development can soon disappear.
113	418	Local Resident	Thomas	Dyton	WHRRRA (Member)		TCC4		In terms of medical provisions, it is important to reinstate the A&E in the area – either at Central Middlesex or Hammersmith Hospital. Currently, our closest A&Es are an hour away by public transport and over 30 minutes drive.
93	536	Residents Association			Wells House Road Residents Association		TCC4		In terms of medical provisions, it is important to reinstate the A&E in the area – either at Central Middlesex or Hammersmith Hospital. Currently, our closest A&Es are an hour away by public transport and over 30 minutes drive.
47	608	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		TCC4		We continue to support the approach taken within TCC4: Social Infrastructure. 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 of the existing social infrastructure outside the OPDC area.
230	1005	Statutory Consultee	Malcolm	Souch	NHS London Healthy Urban Development Unit		TCC4	10.32	In April 2018, the CCGs modelled the impact of the phased population growth and the demand for primary and community care floorspace and the assumptions and outputs were included in the Social Infrastructure Needs Study (June 2018). The overall conclusion is that demand from all population growth in North Acton and Park Royal and from Phase 1 growth in Old Oak North and South could be accommodated in planned expansions to existing infrastructure, and that additional floorspace in a new facility is needed to accommodate growth in Old Oak North and South from Phase 2 onwards (2024 onwards).
230	1006	Statutory Consultee	Malcolm	Souch	NHS London Healthy Urban Development Unit		TCC4	10.32	It should be acknowledged that the planned capacity expansion up to 2024 is based on current knowledge and availability of both potential space and investment, including developer contributions. If the quantum and phasing of development changes and the space is no longer available, then alternative options will need to be considered.
230	1007	Statutory Consultee	Malcolm	Souch	NHS London Healthy Urban Development Unit		TCC4	10.32	The CCGs will continue to work with OPDC to monitor and refine the floorspace requirements as population projections and healthcare assumptions change. The on-site floorspace requirement included in the 2018 Social Infrastructure Needs Study and referred to in paragraph 10.32 of the draft Local Plan, reflects the modelling to date. However, the floorspace figure should be considered as indicative and does not commit the NHS to take on the precise quantum of on-site floorspace, or inhibit the CCGs from exploring alternative options. Ongoing discussions are needed with regard to the timing, location and affordability of the new health facility.
230	1008	Statutory Consultee	Malcolm	Souch	NHS London Healthy Urban Development Unit		TCC4	10.32	To reflect the above, the CCGs suggest the following amendments to paragraph 10.32: In respect of health, the modelling undertaken by the Clinical Commissioning Groups (CCGs) shows the on-site need for space within the Local Plan period is for 1,564 sqm of on-site health facility space by the end of the Local Plan period. According to current projections, demand for services prior to 2024 can be accommodated, based on current knowledge and availability, in planned expansions to existing infrastructure within and around the OPDC area. The Local Authorities and Clinical Commissioning Groups (CCGs) have confirmed that the preferred approach for the delivery of this the on-site floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. The Social Infrastructure Needs Study has assessed the different site options for the new facility on-site needs for this facility, and identifies the Cargiant site allocation in Old Oak North as the preferred option, which shows the need for this facility within the Cargiant site allocation, based on current projections.
231	1089	Local Resident	Eric	Leach			TCC4	10.32	There is an identified 'need' for a new 1,564 on-site health facility within the Local Plan period. (No details are given as to whether this facility would provide Primary Care, Out of Hospital Care, physical health care, mental health care or Secondary Care). In September 2017, NHS North West London (NWL) had its request for funding for extensive, new building works throughout NWL rejected by NHS England (London) and NHS Improvement (London). There simply is just no funding for this new on-site health facility.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1284	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC4	d)	See response for D4 for Educational and Health social infrastructure. Add a new point (vii) under criteria (d) of Policy TCC4 as follows:- “vi) That is orientated away from main sources of poor air quality e.g. busy roads, combustion based energy plant and provide mitigation for the impact of poor air quality”
56	1285	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC4	Para 10.28 and 10.32	OPDC have prepared a Social Infrastructure Needs Study which they consider adequately assesses the need for health care facilities as a result of development planned for the OPDC area. LBHF has some serious concerns with this study in terms of the assessment of secondary/acute health care needs which require further work to be undertaken. We request that OPDC undertake further work to project the acute care needs of this increased population. We would welcome being involved in this work.
56	1288	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC4	Para 10.33	LBHF is statutorily responsible for providing libraries. As part of OPDC’s Social Infrastructure Needs Study, the need for libraries has been assessed with a need for 1,584 sqm of library floorspace identified. An integrated approach is taken for the provision of library facilities as part of a multi-use community hub which could encompass other community facilities such as public toilets, youth space, faith space etc. Current modelling shows a need for two community hubs, one in Old Oak South and one on Old Oak North. Given the need for library services identified in the Social Infrastructure Needs Study, these should be specifically referenced in para 10.33. Amend Para 10.33 as follows:- “In respect of community space, modelling shows the need for two community hubs, each of 2,600 sqm. The community hubs should provide for a variety of community facilities including library provision and could include other facilities such as public toilets, a community café, faith space, youth space and halls for hire. Current modelling shows...” Given LBHF are the responsible for the provision of libraries, we wish to be part of discussions over library provision within OPDC area.
110.b	1443	Community Group	Robin	Brown	Grand Union Alliance		TCC4		The understanding of social infrastructure provisions seems limited to expanding 2 hospitals, a health centre, 2 centralised community hubs which will be delivered only after 2024/2026 and 2037 (and located away from existing residential communities), a primary and a secondary school, 2 sports centres and some nurseries.
110.b	1536	Community Group	Robin	Brown	Grand Union Alliance		TCC4	10.33	10.33: Understand the preference for one health facility space within Old Oak North for clinically more effective healthcare provision, but adequate pick up and drop off facilities are essential because many users of services at the health centre cannot use public transport due to physical disability. Therefore, location and siting is of critical importance, particularly since Old Oak North will not be a ‘through zone’ for private vehicles and health service catchments will not necessarily be bounded to the development areas planned by the OPDC.
110.b	1537	Community Group	Robin	Brown	Grand Union Alliance		TCC4	10.34	10.34: Facilities need to be heavily discounted for inclusive community use. In addition to flexible spaces/ halls for hire, more permanent space is required for young people, older people and voluntary organisations/charities, including their back offices. The need for provision for faith organisations was also emphasised by GUA member and affiliated organisations when soundings were taken. Voluntary groups could work with Housing Associations to secure community rooms, but not on the scale of community hubs, each of 2,600 sq. m. Identification of the need and a potential solution, community hubs, is not enough. There should be clarity over the funding mechanisms and management/operation in order to have certainty over delivery. These matters are inextricably linked and even if para 10.41 is ‘unchanged’ the following comment has validity: reliance on private sector is likely to give rise to conflicts between affordability and the pursuit of profit and commitments can be tenuous. The certainty of delivery of community facilities is certainly disputed, given the failure of the ASDA redevelopment to provide the promised community centre.

Policy TCC5: Culture and Art

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
92.b	440	Community Group	Melanie	Whitlock	The Hammersmith Society		TCC5		Policy TCC5 – Culture and Art e) c) We welcome the retention of this policy for the retention of the artists’ studios in Hythe Road which we have been asking for, but are concerned re the inclusion of the caveat at policy E 2 that they could be relocated and we request the deletion of the reference to E2 here.

Policy TCC6: Sports and Leisure

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	225	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	TCC6		We also feel that the requirement for anything more than one 25m swimming pool within the OPDC area is considered to be unnecessary in relation to the average level of provision of such facilities in London. This is particularly important given the cost and other priorities for infrastructure funding. We would suggest that the requirement for a second 25m pool, or one 50m pool, is removed from the Plan.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
33	803	National Body	Mark	Furnish	Sport England		TCC6		Some Places Policies, and supporting text, however, do highlight that sport centres would be required and the needs for this is based on population and child yield projections (e.g. Paragraph 15). It is not clear to Sport England how OPDC arrived at this view. There is no OPDC area wide Built Facility and/or Playing Field Strategy that fully assesses sports provision and how sport is played in the area and then a strategy that sets out how to respond to current and future demands. Basing the provision of sports facilities solely on future population and child projections does not take into consideration how sport is played in the area (i.e. where participants travel, how far they travel, what sports are played etc.), where would be best to locate facilities to address current and future needs and what actual facilities are provided. For instance, a sports centre could include a mixture of sports hall, swimming pool, tennis courts, Artificial Grass Pitch(es), natural turf pitches and so on, which require varying land sizes. New facilities could also have an impact on other facilities within the area. Sport England notes that the supporting documentation includes a Sports Courts and Swimming Pools Study which although the cover page states is June 2018, the report was drafted by Sport England 2014 and would have used data from the National Facilities Audit as of January 2014. It also is based on a high level assessment of Sports Halls and Swimming Pools within the London Borough of Hammersmith and Fulham, (and not the London Borough's of Ealing and Brent). Sport England does not consider this study up to date, reflect the whole of the OPDC area and sufficient standalone strategy for built sports facilities. It is, therefore, not sound to base provision on this document alone and OPDC should develop a Built Sports Facility Strategy to robustly plan for Built Sports Facilities.
33	810	National Body	Mark	Furnish	Sport England		TCC6		Policy TCC6 is the Draft Local Plan's main policy on sport and leisure facilities. The amendments to Policy TCC6 are welcomed to some extent as it has taken into consideration Sport England's previous comments as well as its Planning Policies and national policy. In particular, referring to indoor and outdoor leisure facilities, including playing field, is welcomed and provides more clarity than other parts of the Draft Local Plan,
33	811	National Body	Mark	Furnish	Sport England		TCC6		however Sport England does have some concerns as follows: Ensuring that facilities are accessible to all is important therefore the requirement that facility enhancement meets the Inclusive Fitness Initiative Mark is welcomed however since Policy TCC6 includes all indoor and outdoor facilities the requirement for all development to meet this standard could prevent some facility enhancements as it would not be directly applicable, for example drainage improvements to a playing pitch/field. Sport England, therefore, advise that b) ii) is amended to 'achieves the "Inclusive Fitness Initiative Mark" where applicable' and the supporting text explains when development should meet the Inclusive Fitness Initiative Mark.
33	812	National Body	Mark	Furnish	Sport England		TCC6		In order to align with the NPPF 'playing pitches' in c) is changed to 'playing field'. As noted above, playing fields have a wider function than just providing playing fields, such as informal play, allowing pitches to shift/rotate for maintenance, providing ancillary facilities etc., and have statutory protection.
33	813	National Body	Mark	Furnish	Sport England		TCC6	c)iii)	c) iii) promotes a standards approach which Sport England do not support as it does not take into consideration such as where sport is played, access and so on. Attached is Sport England's guidance note which, although based on CIL and Planning Obligations, sets out the shortcomings of standards based approach to sport facility provision. Sports facility provision should be based on the robust strategies.
33	814	National Body	Mark	Furnish	Sport England		TCC6	c)iv)	c) iv) requires the delivery of leisure/sports centres and the omission of the amount of facilities in the Policy is welcomed as there are no up to date and robust and up-to-date strategies setting out facilities are actually required and where.
33	815	National Body	Mark	Furnish	Sport England		TCC6		Sport England is concerned with the contact of paragraph 10.48 as it is unreasonable for an applicant to undertake a Playing Pitch Strategy (PPS) and/or a Built Facility Strategy (BFS) for Old Oak and Park Royal nor would Sport England encourage an applicant to undertake one. These strategies can take up to a year to develop and should be 'owned' by the OPDC and not a particular developer so that it can be updated, used by all stakeholders and is unbiased. It should be noted that both the London Boroughs Ealing and Brent have PPS's, which are currently up-to-date, and provided are reviewed at least annually, will continue to be. These documents cover the whole of these boroughs and not just Old Oak and Park Royal though therefore OPDC should develop their own evidence base, which can draw on much of the data and findings of the strategies of the attached borough (and work with Hammersmith & Fulham to develop one for the their borough) to produce a PPS and BFS that is focused on the OPDC area. The actions from these strategies, if followed Sport England's guidance, would represent a robust evidence base to inform the Local Plan and Infrastructure Delivery Plan that would result, in Sport England's view, in positivity prepared and consistent with national policy (particularly the NPPF paragraph 96) plans. Sport England would happily work alongside OPDC and Councils on developing this evidence base.
33	816	National Body	Mark	Furnish	Sport England		TCC6		In relation to paragraph 10.51, as noted above, this document is dated 2014 and is considered outdated. It also just referred to Hammersmith & Fulham and not the entire Old Oak and Park Royal area. A BFS and PPS should be undertaken to identify what facilities are actually required and where they will need to be required to meet the needs of the area.
33	817	National Body	Mark	Furnish	Sport England		TCC6		Overall, while there have been some welcomed amendments to the Draft Local Plan, Sport England still have significant concerns with the document in its current form and the lack of appropriate strategies and evidence base. There is still not a robust evidence base to inform its sport and leisure policies therefore they are not positively prepared and consistent with national policy. OPDC should develop robust and up-to-date Playing Pitch and Built Facility strategies that sets out the playing pitch and built sports facility provision needs and recommendations to meet current and future demand for the area which inform the Draft Local Plan and the Infrastructure Development Plan.
33	818	National Body	Mark	Furnish	Sport England		TCC6		The Draft Local Plan, in Sport England's' view, does not highlight the importance of sport and recreation provision, including playing field's, in providing opportunities for the community to have active and healthy lives.
33	819	National Body	Mark	Furnish	Sport England		TCC6		Similarly, to create a place that has physical activity instilled within the built environment the implementation of the Active Design principles should be highlighted and links between the Draft Local Plan and Active Design and its principles, checklist etc. should be established.
33	820	National Body	Mark	Furnish	Sport England		TCC6		As a result, Sport England does not consider, at present, that the approach taken by OPDC in the Draft Local Plan positivity, and adequately, plans for sport and activity. Sport England position is mostly unchanged from its comments dated 11th September 2017 (attached) therefore it still does not consider that the Draft Local Plan is positively prepared or is consistent with national policy and consequently objects to the Draft Local Plan.
119	877	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		TCC6		There is little reference to the Linford Christie Stadium (LCS) in the plan or supporting documents. It is a major recreational opportunity and the Grass pitches currently managed by LCS are within the OPDC boundary area LBHF would welcome a reference to the sporting, leisure and recreational potential of Linford Christie Stadium in the supporting text in an appropriate section which also refers to the relationship between the Linford Christie Stadium and activities on the Scrubs. Sport and recreation will be considered within the Scrubs GIOSSMP and objectives developed as funding is identified.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1290	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC6	b)	Please see council response for EU4 (i) Add a new point (iii) under criteria (b) of Policy TCC6 as follows:- iii) is orientated away from main sources of poor air quality e.g busy roads
56	1291	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC6	Para 10.52	Please see council response for EU4 (i) Amend Para 10.52 as follows:- "OPDC will also support applications for and secure the delivery of and/or contributions towards outdoor sports and leisure facilities including playing pitches, that are orientated away from main sources of poor air quality e.g busy roads, serve needs and provide public and affordable access".

Policy TCC7: Public Houses

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
113	416	Local Resident	Thomas	Dyton	WHHRA (Member)		TCC7		We also ask OPDC to help save our few local community assets, such as the busy Castle Pub in North Acton, threatened by Ealing Council's unsympathetic planning approvals of further tower blocks in the area.
93	534	Residents Association			Wells House Road Residents Association		TCC7		We also ask OPDC to help save our few local community assets, such as the busy Castle Pub in North Acton, threatened by Ealing Council's unsympathetic planning approvals of further tower blocks in the area.
110.b	1549	Community Group	Robin	Brown	Grand Union Alliance		TCC7		Policy TCC7: Support in principle and in detail. Those Public Houses that remain are crucial community supports to the present working, visiting and resident populations of Old Oak and Park Royal and their community value will increase as these grow. Well preserved, they are also of heritage value reflected by their proposed or Existing Locally Listed Building designations, cherished for their contribution to the street scene and personal place memories and affection.
29	1611	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7		The changes made to Policy TCC7 from the previous draft of the Local Plan are welcomed however our clients continue to object to the wording of Policy TCC7 which is overly prescriptive and restrictive towards the loss of public houses. The proposed policy should be sufficiently flexible such that it can respond to the market as necessary, and in order to be "effective" as required by the National Planning Policy Framework (NPPF). Indeed, CAMRA state in their Public House Viability Guidance "times and circumstances do change and some pubs will find themselves struggling to continue." Planning policy needs to be able to quickly and effectively respond to that, rather than be a financial burden on owners or operators.
29	1612	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	a)-i)	We set out below our response to the proposed wording of Policy TCC7: "(a) the public house has been competitively marketed: i) for 24 months as a public house and for an alternative local community facility; The identified period of 24 months is considered far too long and presents an unreasonable length of time to market a property, particularly if the business is struggling commercially. In our view, 6 months would be a more sensible period and certainly no more than 12 months as adopted for other uses within the proposed plan (Policy TCC3, 4, 5 and 6). Indeed, standard industry practice and the CAMRA guidance referred to below recommends 12 months. It is unclear on what basis 24 months is justified.
29	1613	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	a)-i)	"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. The policy is poorly worded and does not reflect reality. Development control policies should not be worded to be so inflexible that a landowner or operator would stand to make a loss over a significant period of time due to a change in circumstances.
29	1614	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	a)-i)	With respect to marketing as an "alternative local community facility", this policy strand is at odds with the Use Class of public houses which are A3 or A3/A4 in some cases and the lawful use of which is as drinking establishments/restaurants. This policy strand cannot be justified or considered effective in the context of the NPPF as public houses are not community facilities in planning terms despite anecdotal evidence that communities gather at some pubs in certain instances. Requiring them to be marketed as such is also at odds with the direction in Policy HC7 of the draft London Plan (December 2017). The policy is too onerous as currently worded, and is therefore not justified or sound.
29	1615	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	a)-ii,iii)	"ii) at an appropriate price following independent valuation;" Fullers' comments in respect of strand (i) also apply to this element of the policy. "iii) in appropriate publications and through specialised licensed trade agents;" "Appropriate publications" lacks definition and is poorly worded. It also has the potential to be redundant if it can be demonstrated that the use is unviable and therefore there would be no interest to other users. Please also see comments made at (i) above as they apply equally to this proposed draft text – this is not how the industry operates and to do so would adversely affect the value and viability of the public house. Again, it is unclear on what basis this is justified as a sound or effective approach.
29	1616	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	a)-iv)	"iv) in a condition that allows the premises to continue operating as a pub or as a community facility;" The reference to a condition that allows the premises to continue operating as a pub lacks definition and is poorly worded. It ignores the fact that many pubs are put up for sale as a result of the cost of maintaining and making repairs to the buildings outweighing their operational value. Furthermore, it is overly-restrictive of the OPDC to seek to dictate the condition in which landowners should maintain their properties. As outlined in respect of (i) it is not considered that policy can justify including a requirement to market a building for a use in which it doesn't operate (community facility).

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
29	1617	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	b)	"(b) an assessment has been made of alternative licensed premises within easy walking distance of the public house and premises are identified which offer similar facilities and a similar community environment to the public house which is the subject of the application;" This element of the policy is overly prescriptive and the requirement to assess alternative licensed premises is not consistent with national policy as required by the NPPF. Independent of this 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 worded, and is therefore not justified or sound.
29	1618	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	c)	"(c) the proposed alternative use will not detrimentally affect the character and vitality of the area and will, where appropriate, retain as much of the building's defining external fabric and appearance as a pub as possible;" Recognition should be made within this element of the policy that 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. It should be noted that various bars/cafes and restaurants etc. are planned as part of the new developments that are now coming forward in the area.
29	1619	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner		TCC7	d)	"(d) there has been public consultation to ascertain the value of the public house to the local community and the proposal does not demonstrably constitute the loss of a service of particular value to the local community;" 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 no interest in the value of a public house.

Policy TCC8: Catalyst Uses

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
14.b	52	Planning Consultant	Ashley	Collins	JLL	Imperial College	TCC8		Within draft Policy TCC8 and elsewhere within the draft Local Plan, there are references to catalyst uses, which could help deliver a successful regeneration of the OPDC area. The inclusion of education as one of these catalysts is supported by Imperial College London. Whilst the educational achievements of Imperial College London are probably well known, with it consistently rated in the top three universities in the UK, and in the top 10 in the world, it is important to understand that research is also central to its activities. The 2014 Research Excellence Framework, which assesses the quality of research in UK higher education institutions, concluded that 97% of Imperial's research is classed as having 'outstanding' or 'very considerable impact'. Imperial College London collaborates with businesses, academia, non-profit healthcare and government institutions across the globe, as it recognises that the full benefits of its work cannot be realised by itself. It actively engages in multi-disciplinary research, since it believes that only by bringing together expertise from different disciplines, can the next generation of global challenges be solved. Imperial College London has ambitions to grow the number of spin-out businesses significantly. Therefore strong links with institutions such as Imperial College London and its emerging campus at White City, will indeed act as a catalyst to help make a success of the OPDC.
113	420	Local Resident	Thomas	Dyton	WHRRRA (Member)		TCC8		There is a need for a cultural catalyst for the area and this seems to have been forgotten in the current plans. West London has few galleries, museums and spaces for theatre and arts. An arts facility similar to the Southbank would generate income from visitors and add character and vibrancy to the area. This could be close to the canal – either in Park Royal or Old Oak Common. Against this, a conference centre or stadium would detract from the personality of the area. These types of facilities tend to be sterile, self-contained destinations for visitors who do not participate in or contribute to the broader community. In addition, they create litter and, in the case of football stadiums, require substantial additional police support.
93	538	Residents Association			Wells House Road Residents Association		TCC8		There is a need for a cultural catalyst for the area and this seems to have been forgotten in the current plans. West London has few galleries, museums and spaces for theatre and arts. An arts facility similar to the Southbank would generate income from visitors and add character and vibrancy to the area. This could be close to the canal – either in Park Royal or Old Oak Common. Against this, a conference centre or stadium would detract from the personality of the area. These types of facilities tend to be sterile, self-contained destinations for visitors who do not participate in or contribute to the broader community. In addition, they create litter and, in the case of football stadiums, require substantial additional police support.
47	609	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		TCC8	10.57	Policy TCC8 is concerned with what are termed "Catalyst Uses." The policy requires the provision of what is termed "a Catalyst Uses Statement" for a use in excess of 10,000 sq m and/or 0.25 hectares of land. Paragraph 10.57 notes that retail and leisure uses can be a form of catalyst use. The Council recognises that this the case and the important contribution that such a use can have upon achieving the strategic objectives as set out in Table 10.2. However, the Council remains concerned that, as drafted, there is no reference within Policy TCC8, or the supporting text, that a "catalyst retail use" must be subject to the impact assessment and other safeguards set out in Policy TCC3.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
56	1292	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		TCC8	b)	See council response for EU4 Amend criteria (b) of Policy TCC8 as follows:- b) The Catalyst Uses Statement should demonstrate how the proposal performs positively against the six five following objectives and associated criteria set out in Table 10.2: i) Is part of a holistic offer; ii) Is financially sustainable; iii) Complements the wider environment; iv) Generates momentum in delivering the comprehensive redevelopment of the area; and v) Leverages HS2 and the Elizabeth Line. vi) that does not result in the deterioration in local air quality and/or the exceedance of the WHO Air Quality Guideline values

Policy TCC9: Meanwhile Uses

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
42	229	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	TCC9		We welcome the introduction of a test of appropriateness in relation to meanwhile uses.
110.b	1442	Community Group	Robin	Brown	Grand Union Alliance		TCC9		But we know transport infrastructure alone is not enough to make a place. Communities also need more safeguarded meeting spaces, a better developed Meanwhile use strategy, and support to make on and offsite facilities genuinely accessible and affordable to them.

Policy TCC10: Visitor Accommodation

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
36	290	Statutory Consultee	Julietta	McLoughlin	Mayor of London		TCC10		The Mayor welcomes the deletion of the reference to 40,000 new hotel bedrooms in policy TCC10. New evidence for the emerging draft London Plan suggests this figure will increase.

Policy TCC11: Night Time Economy Uses

No comments

Chapter 11. Delivery and Implementation

Policy DI1: Balancing Priorities and Securing Infrastructure Delivery

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
113	422	Local Resident	Thomas	Dyton	WHRRRA (Member)		DI1		There is a need to ensure that developments built on H&F land provide mitigation measures and compensate residents and businesses impacted in Ealing and Brent, i.e. SIL and Section 106 funds should be spread across the area impacted and not preserved by H&F for H&F communities only. We have seen the destruction of our road surfaces and markings, littering and the pollution caused by HGVs for the Crossrail Depot and Oaklands but no funding has come back into Ealing communities impacted by this work. This needs to be addressed. Wells House Road currently has no pedestrian crossing on the busy and dangerous Old Oak Common Lane. Ealing Council has ignored requests for traffic calming, repairing road surfaces and markings, speed cameras, enforcement of the 20mph speed limit and safe pedestrian crossings. We would request that OPDC intervenes in the absence of a responsive council.
93	540	Residents Association			Wells House Road Residents Association		DI1		There is a need to ensure that developments built on H&F land provide mitigation measures and compensate residents and businesses impacted in Ealing and Brent, i.e. SIL and Section 106 funds should be spread across the area impacted and not preserved by H&F for H&F communities only. We have seen the destruction of our road surfaces and markings, littering and the pollution caused by HGVs for the Crossrail Depot and Oaklands but no funding has come back into Ealing communities impacted by this work. This needs to be addressed. Wells House Road currently has no pedestrian crossing on the busy and dangerous Old Oak Common Lane. Ealing Council has ignored requests for traffic calming, repairing road surfaces and markings, speed cameras, enforcement of the 20mph speed limit and safe pedestrian crossings. We would request that OPDC intervenes in the absence of a responsive council.
56	1293	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		DI1	b) and Para 11.11	LBHF request greater involvement in negotiating S106 Planning Agreements to secure appropriate financial contributions and/or affordable housing for development taking place in the OPDC area. In addition, we also request greater involvement in the spending of CIL and S106 monies arising from development, with LBHF council priorities reflected in decision making on this. OPDC to allow greater involvement of host boroughs including LBHF in negotiating S106 agreements including agreeing Heads of Terms and the spending of CIL/S106 monies collected from development within the OPDC area. The involvement of host boroughs in this process should be referenced in Policy DI1.
56	1294	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		DI1		In their Local Development Scheme, OPDC have committed to preparing a Planning Obligations SPD to support policies in the Local Plan. This is proposed for public consultation in November 2018. However, there is no mention of this in Policy DI1. This document will provide further details on the mechanisms for securing financial contributions for a wide variety of infrastructure needed to support a development and should therefore be mentioned in this policy. Given LBHF is the infrastructure provider for a number of service areas, LBHF would welcome being involved in the preparation of this document ahead of the start of public consultation.
235	1320	Planning Consultant	Jamie	Bryant	Indigo	Aberdeen Standard Investments	DI1		Comment: This policy seeks to secure the delivery of infrastructure necessary to support sustainable development, and where necessary, to mitigate its impacts as identified in the Local Plan policies and/or in the Infrastructure Delivery Plan (IDP) Changes sought: The level of Section 106 and CIL contributions sought on individual sites should ensure that new development remains viable and that the market is appropriately incentivised to bring schemes forward. Land owners and tenants at Park Royal should not be overburdened and penalised by being required to make significant contributions to fund ambitious infrastructure plans at Old Oak.
22	1572	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		Our criticisms of the plan could be put very simply and directly:: The Revised Draft of the OPDC's Local Plan contained little consideration of financing mechanisms and it wasn't clear how developments that would take place over more than two decades would be funded
22	1573	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		The OPDC appeared – despite its great and estimable ambitions - to be heavily reliant on weak, one-off instruments (Section 106 Agreements and a CIL), to meet its goals and great ambitions. Instruments that have served public authorities poorly and are part of a planning and development system that has, all too often, failed the public and been at the core of asymmetric public-private partnerships
22	1574	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		We took the view that:/: If any large-scale urban development project was to be sustainable and successful, especially in London, with its deeply entrenched social and economic inequalities, it was vital to develop an approach to development finance and land ownership that empowered – rather than weakened - the authority responsible for planning and, in the case of the OPDC, delivery of a significant part of what was planned.
22	1575	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		We were convinced that: The OPDC, as both developer and planning authority, was well placed, should it have political backing, to challenge and change the unsustainable, inefficient and unfair way in which public infrastructure is currently paid for and maintained in the UK
22	1576	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		In following this proposition up – and in an effort to put some flesh on the bones of our response to the draft plan - we researched, wrote and published:Let's Supercharge the OPDC and bring 'Singapore' to Thames side.MSince the publication of Let's Supercharge to OPDC another document, commissioned by the GLA and the Mayor, and researched by Nicholas Falk and URBED, has come into the public domain: Capital Gains: A Better Land Assembly Model for London. Although it doesn't go as far, in making the case for a Singapore style land value capture housing and economic development model, as the publication I contributed to, it does make the case for LAZs (Land Assembly Zones) and includes a very specific reference to Mayoral Development Corporations: In sites where there are cross boundary influences, or for particularly large and complex sites, the GLA or an identified subsidiary delivery vehicle, such as a Mayoral Development Corporation, should take the lead role.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
22	1577	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		It is clear – in line with Falk/URBED's analysis, international cases studies and 'Capital Gains' recommendations - that the funds required for infrastructure development and other critical works needed in complex urban sites, where major transport infrastructure schemes are planned, and that finance to support a variety of housing and employment initiatives, can be secured through land value capture mechanisms.
22	1578	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		While the second iteration of the revised Draft Local Plan acknowledges [e.g. 4.37 use of CPO powers 'to facilitate comprehensive regeneration'] the role that compulsory purchase powers may have in assembling sites and steering development it is obvious that the Corporation needs more encouragement from the Mayor and the GLA if it is to pursue a more radical course.
22	1579	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		It remains my view that: The OPDC needs to give careful consideration to retaining the ownership of lucrative sites, in order to secure the permanent income—in the form of rent—that it (or a suitable successor) will need if it is going to be able to meet the long-term costs associated with building a strong and sustainable community and caring, over the longer term, for the shared environment.
22	1580	Interest Group	Ed	Randall	Professional Land Research Group and Coalition for Economic Justice		DI1		Despite the repeated references, in the draft plan, to 'sustainable development' the lack of detail in the plan about how the finances that are surely needed to achieve sustainability will be generated remains one of the plan's great weaknesses. Experience, in the UK and elsewhere, has shown that, when there has been strong political will and clear leadership, land value capture mechanisms have been used successfully to fund initial development and to establish a virtuous cycle, so that revenue is available to enhance housing and employment opportunities, protect the environment and improve quality of life in local communities. In other words: real sustainability.

Policy DI2: Timely Delivery and Optimised Phasing

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
28	770	Strategic Partner	Lucinda	Turner	Transport for London		DI2	11.23 Table 11.1	TfL welcomes the additions to 11.23 and alterations to table 11.1 that clarify the status of the Elizabeth Line depot site and rail land at Willesden Junction alongside recognition that in any future plans for rail sites, account will need to be taken of future operational needs.

Policy DI3: Stakeholder Engagement and being a Proactive Planning Authority

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
120	1623	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		DI3		HNF welcomes OPDC's continued support of Neighbourhood Forums and within this policy the addition of support for community housing projects.
120	1624	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		DI3		While references to supporting business and stakeholder forums are made, the continuing asymmetry between the resources available to developers on the one hand and voluntary groups of local residents and small businesses on the other needs to be addressed. We would welcome the opportunity of a dialogue with OPDC to explore options to address this imbalance of resource and capacity.
120	1625	Neighbourhood Forum	Leão	Neto	Harlesden Neighbourhood Forum		DI3		In a separate but related point, while initiatives such as the design groups are a step in the right direction, continuing financial support of local networks as a proven way of maintaining community engagement should be implemented by the OPDC

Policy DI4: Planning Powers and Monitoring

No comments

Chapter 12. Glossary

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Policy	Para/Figure Reference	Comment
119	834	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust				Add A Definition of Metropolitan Park and Metropolitan SINC in the Glossary

Supporting Studies

A40 Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1265	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		A40 Study		There is no mention of improvements to pedestrian facilities at the Savoy Circus. This is an aspiration of the council and should be included in the A40 study.

Bus Strategy

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1266	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Bus Strategy		The council will support the delivery of highway links with suitable provisions for double decker buses and for buses to stop without obstructing the free-flow of traffic.
56	1267	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Bus Strategy		The council supports the development of infrastructure to support the implementation of electric buses throughout the borough, including the Old Oak area.

Car Parking Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1268	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Car Parking Study	Page 1	The document proposes limiting car parking to 0.2 spaces per residential unit in the early years of development, reducing to car free when transport investment is committed. The Highway Authority questions the mechanism which is proposed to ensure that this will occur post development.
56	1269	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Car Parking Study		An approach is required to determine the differing car parking requirements of developments located in areas of varying PTAL levels. Such an approach should be agreed by TFL, OPDC and the council.
56	1270	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Car Parking Study		The Highway Authority supports car permit free developments in areas of PTAL 3 and above. Car permits may be issued to residential developments in areas of PTAL 1-2 subject to the assessment of overnight on-street parking stress.

Construction & Logistics Strategy

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1271	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Construction & Logistics Strategy		The council will require that a construction logistics liaison group is established and funded by developers, in order to ensure co-ordination on the public highway in regard to construction vehicle traffic.
56	1272	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Construction & Logistics Strategy	Page 17	P.17 It is stated that CLP's 'will be approved by OPDC and TfL' in the document, therefore excluding the council. This is not correct as CLP's will be for local roads which will be approved by the Highway Authority.

Development Capacity Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
42	230	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	Development Capacity Study		We continue to support the inclusion of the Cargiant site as Site 5 in Appendix B for inclusion in Part 1 of OPDC's Brownfield Register.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
110.b	1437	Community Group	Robin	Brown	Grand Union Alliance		Development Capacity Study		The Development Capacity Study which proposes allocations of development for each site in the OPDC area refers to the draft London Plan's treatment of targets set for Opportunity Areas. It also states that these can be seen as minimum targets. Paragraph 3.3: "The GLA's Housing SPG (2016) states that targets should be considered as a minimum starting point, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in the London Plan Sustainable residential quality (SRQ) density matrix (table 3.2)." This starting point for assessing development capacity and density ranges is deeply flawed, as it is not based on any evidence and establishes unrealistic targets for a complex site such as the OPDC, presently with minimal sources of funding for infrastructure and remediation.

Development Infrastructure Funding Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
47	611	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		Development Infrastructure Funding Study		Further comments to the supported document Development Infrastructure Funding Study have also not been taken forward. Paragraph 17.12 (page 123) needs amending to make clear that the Counters Creek sewer is already in place. The project that Thames Water were developing until 2016 was the Counters Creek Storm Relief Sewer. It should be noted that Thames Water are no longer pursuing the relief sewer and this should be corrected in the supporting documents. Regarding paragraph 17.25 (recommendations, page 127): the 4th bullet point should be removed as it explains that if negotiations with the Canal and River Trust fail, then Counters Creek could be considered as an alternative. This contradicts what it is said in paragraph 17.12. Any discharge to the Counters Creek sewer should only be considered as the last alternative once all other options have been explored. In addition, a further bullet point could be included here to refer to innovative new ideas and processes which could reduce costs with time.

Duty to Cooperate Statement

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
238	1595	Local Authority (Waste)	Jonathan	Wade	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington & Chelsea		Duty to Cooperate Statement		NPPF 181 required local planning authorities to "demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination". We are therefore extremely disappointed to note that none of the supporting documentation for the second revised draft Local Plan (including the Waste Apportionment Study, the Waste Management Strategy, the Duty to Cooperate Statement and the Statement of Consultation) mentions Lambeth, Kensington & Chelsea and Wandsworth's aspiration to pool capacity and apportionment targets and to plan for waste collectively across the Western Riverside area. Nor does it address or take account of our joint representation on this matter (summarised above). It is our view that the omission of this key aspect of Western Riverside duty to co-operate discussions means that the evidence is not "robust" as required by NPPG, and an Inspector will not have all the necessary information to assess "the implications of any cross boundary issues" (NPPG 012), nor if the OPDC has produced "effective policies on strategic cross boundary issues" nor to "assess the outcomes of cooperation" (NPPG 010). It is also our view that the omission from supporting documentation of Lambeth, Kensington & Chelsea and Wandsworth's aspiration to pool capacity and apportionment targets and to plan for waste collectively across the Western Riverside area demonstrates an unwillingness on the part of OPDC to co-operate on this matter. While there are many references to the joint Waste Technical Paper (WTP) (2017) and "joint working" in the OPDC's Local Plan and supporting documentation, nowhere does it take account of the findings of the WTP. The WTP clearly identifies a gap in waste capacity for Lambeth, Kensington & Chelsea and Wandsworth for both apportioned waste (LACW and C&I) and CD&E waste streams. The Powerday and EMR sites in the OPDC area would contribute significantly to meeting this unmet waste capacity need across the whole of the Western Riverside area. The National Planning Policy Framework (NPPF) paragraph 182 sets out the tests of soundness against which a Local Plan is examined. Its states that Local Plan should be 'positively 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." Again, it is our view that the omission from supporting documentation of Lambeth, Kensington & Chelsea and Wandsworth's aspiration to pool capacity and apportionment targets and to plan for waste collectively across the Western Riverside area means that it is not possible for an Inspector to assess if the OPDC's Local Plan is 'positively prepared' because there is no evidence that OPDC have considered unmet need from its neighbouring authorities. While OPDC do not have their own apportionment targets, the corporation is a waste planning authority and has planning control over the main sources of available waste capacity in the Western Riverside area. OPDC therefore has a duty

Energy in Tall Buildings Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
110.b	1516	Community Group	Robin	Brown	Grand Union Alliance		Energy in Tall Buildings Study		The emerging draft new London Plan sets a recycling target of 65% by 2030. This is very challenging particularly for the form of development proposed by the OPDC given that the OPDC's Supporting Study says "on average waste recycling in tall buildings is 50% less than from housing". High density and mixed use buildings require adequate space for at least 3 different types of residential waste, commercial waste, bulk waste. And probably also, compaction technologies, anaerobic digesters, telemetry & CCTV to check when bins are full, (macerators not recommended). Necessary because OPDC Delivery and Sustainability Strategies, and service cost cutbacks, all suggest less frequent waste collection using larger vehicles. Most OPDC residents will live in high-rise flats with distant communal waste stores, likely in a basement rather than on public realm level. But collection vehicle access point should be within 25m and/or 10ms level access from a truck accessible road; and [residential] waste disposal points in public spaces no further than 30m from the front door. To meet these requirements, the Supporting Statement indicates that the OPDC will depend on mechanical & smart tech solutions for taller buildings, at added cost. This also requires pro-active management/enforcement and continual resident engagement. Lower rise buildings would be a simpler and equally valid suggestion. The Supporting Study also suggests a 'single commercial waste management contract', which requires tenancy/business licensing lock-in, procurement and management overheads, and raises value for money considerations.

Gypsy and Traveller Accommodation Needs Assessment (GTANA) Addendum

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
47	603	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		Gypsy and Traveller Accommodation Needs Assessment		The Council has previously provided comments to the OPDC GTANA addendum update and wish these to be considered as part of this Regulation 19 consultation as the comments remain. Our concern remains that, OPDC has not presented any evidence of a wider call for sites for gypsy and traveller use or undertaken a review of other sources of potential sites.

Heritage Strategy

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1179	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Heritage Strategy	Appendix	Nos. 23-25 Scrubs Lane were proposed by OPDC as 'local listed buildings' in the recent OPDC Local Listing consultation, rather than as 'other buildings of heritage interest' as referred to on pages 192-3 and page 208 in the Appendix of the Heritage Strategy. LBHF supported the proposed local listed building designation for Nos. 23-25 Scrubs Lane.
56	1180	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Heritage Strategy	P.194	Old Oak and Wormholt Conservation Area adjoins the OPDC area and was not included as an existing conservation area on page 194 of the Heritage Strategy, although St Mary's Conservation Area, which is also within LBHF was.

Industrial Land Review (ILR) Addendum

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
43	1328	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	Industrial Land Review		Several updates have been prepared to Industrial land study. In particular, this has been supplemented by additional information in an Addendum (ILR Addendum 2018). This new Addendum also supersedes a previous 2017 Addendum. Paragraph 3.9 of the ILR outlines that given the London-wide loss of industrial land and the proposal to de-designate SIL in Old Oak, it is becoming increasingly important to protect existing industrial land in Park Royal and ensure that development proposals, are making the best use of land and are suitably intensifying industrial activities. The Mayor's London Plan also sets out a target for delivering an additional 10,000 jobs in Park Royal, therefore an uplift in employment also needs to be considered. To achieve the aspirations, set out by the OPDC and the Mayor of London, sites which optimise industrial uses and which provide uplift in employment numbers should be supported in principle even where some of the employment generating uses are not all in industrial use. Paragraph 3.13 of the ILR notes that "in response to consultation responses received on the previous Revised Draft Local Plan, the updated Second Revised Draft Local Plan includes new site allocations for industrial intensification sites (shown in Figure 4)." However, when looking at figure 4, the map just states industrial site allocations but does not seem to identify the new sites allocations for industrial intensification.
43	1329	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	Industrial Land Review		The ILR addendum from paragraph 4 and more specifically figure 9, considers the merits of de-allocating a number of SIL sites. Only one site is proposed to be de-designated as SIL (site 2 & 5 – Goodhall St and Ursula Lapp Estate). This site is adjacent to a residential area which is also a conservation area to the south. It also abuts railway land and SIL to the north and south/east. According to the ILR the interface with the rest of the SIL boundary is very limited and the site is effectively cut off from the wider SIL area and safeguarded Powerday waste site by railway lines.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
43	1330	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	Industrial Land Review		Within the recommendation for de- designation, it states that “the site has a high PTAL and could in principle support mixed use development, subject to mitigating impacts on adjacent sensitive uses and conservation area.” In addition, in light of the demand for industrial floorspace the recommendation is that the loss of land must be mitigated and that any development proposals for this site should require no net loss of industrial floorspace through co-location of industrial uses as part of any future development of this site.
43	1331	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	Industrial Land Review		We are supportive of the reasoning behind this recommendation for de-designation. It recognises the appropriateness in land use terms, of development proposals coming forward providing a mix of uses including industrial, in area of high public transport accessibility. This takes into account the constraints of the site and realises the opportunity for realistic intensification. In our view, OPDC should consider this approach on sites that continue to have a SIL designation which are in edge of town centre locations, near to more sensitive uses and which are in close proximity to public transport. To do otherwise is to waste an opportunity to secure intensification. If no net loss of SIL were achieved these is nothing inconsistent with the London Plan SIL designation.
43	1332	Planning Consultant	Hannah	Willcock	DP9	A40 Data Centre B.V	Industrial Land Review		628 Western Avenue is located within, but on the edge of the SIL designation and adjacent to Park Royal Underground Station. This site, similar in nature to Sites 2 and 5 mentioned above would provide a highly acceptable location for industrial uses and other non-industrial complementary uses, like hotel.

Infrastructure Delivery Plan

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
17.b	276	Strategic Partner	Debbie	Fifer	Canal & River Trust		Infrastructure Delivery Plan	NU26	The IDP (June 2018) has identified the need to reroute the existing Stamford Brook Sewer along the north of the canal at Old Oak Common (ref NU26). We would advise that works in proximity to our canals have the potential to adversely affect structural integrity and it is therefore essential that the canal is not put at risk as part of any development proposal, including excavations, loading caused by plant or stockpiling of materials or vibrations from plant or machinery. Early discussion with the Trusts Infrastructure Services Team is therefore advised.
56	1287	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Infrastructure Delivery Plan		LBHF supports the wording in para 6.4 and 6.5 of the OPDC’s Infrastructure Delivery Plan which states that “Central Middlesex and Hammersmith Hospital no longer have A&E departments so Charing Cross Hospital will be essential in meeting the acute health care needs of an expanded population in the OPDC area.”

Integrated Impact Assessment

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
114	936	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Integrated Impact Assessment		The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are: <ul style="list-style-type: none"> • Inadequate consideration of alternative options in the Integrated Impact Assessment contrary to EU requirements for Strategic Environmental Assessments.
114	962	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Integrated Impact Assessment		12.1 The NPPF and National Planning Practice Guidance requires that Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role through- out the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives. Paragraph: 016 Reference ID: 12-016-20140306. 12.2 The OPDC has published its sustainability appraisal as part of a document led Integrated Impact Assessment and Habitats Regulation Assessment (Supporting Study No.28). This document has been prepared by the consultancy Arcadis. The report is an updating of that provided for the Regulation 18 and 19.1 consultations. 12.3 Paragraph 3.4 of the document acknowledges that It is a requirement of the SEA Directive that ‘reasonable alternatives’ are assessed and, therefore, alternative options have been assessed using the IIA Framework. This paragraph states 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 that the preferred option was 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 Opportunity areas are 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. The text continues: In light of these strategic planning documents defining the housing and jobs targets for the Old Oak and Park Royal, alternative development capacities are not considered to be reasonable alternatives and have therefore not been assessed (our emphasis). 12.4 It appears that this paragraph has been added to the 19.2 version of the Integrated Impact Assessment following responses to the 19.1 version of the Local Plan which flagged up the lack of consideration of alternative options on key issues such as development capacity and housing densities, throughout the OPDC Local Plan process, from the 2015 OAPF to the present. This does not seem an adequate approach to the examination of reasonable alternatives as required by a SEA.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
114	963	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Integrated Impact Assessment		<p>12.5 The Integrated Impact Assessment prepared for the FALP in 2013 (by consultants AMEC)3 includes a brief section on 'Spatial Development Options' at paragraph 2.3.1 (as referred to by Arcadis above). Three options are dismissed with a few lines on each. The fourth and preferred option is based on accommodating growth within London's boundaries but without strategic extensions on to the Green Belt or open land. The paragraph goes on to note In addition a review of the housing potential within the Opportunity Areas shows significant potential for additional housing capacity. For example, the potential investment and alterations resulting from Crossrail and HS2 has resulted in the number of homes projected for Park Royal / Old Oak Common / Willesden Junction increasing from 1,500 to 19,000.</p> <p>12.6 This surely cannot be a proper SEA 'testing' of four pan London options, as is claimed in the latest version of the Arcadis IIA. Nor does it begin to approach a testing of specific options at Old Oak. It is a simplistic conclusion that future development at Old Oak should be planned in a context of meeting a large share of London's projected housing need without encroachment on the Green Belt. The housing number cited is not 24,000 but 19,000, a significant difference.</p>
114	964	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Integrated Impact Assessment		<p>12.7 These matters are covered in Appendix C of the 2018 IIA prepared by Arcadis (pages not numbered). This appendix comments on the 15 consultation responses from local groups and individuals to the IIA for the 19.1 OPDC Local Plan, all of which questioned the lack of consideration of alternatives on development capacity. The consultants repeat the position adopted by OPDC in stating 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. To local people, this makes a mockery of EU requirements on SEAs as well as the statutory requirements for consultation on Local Plans.</p> <p>12.8 Hence the IIA/SEA supporting the 19.2 Draft repeats the pattern cited above, whereby each stage of the OPDC planning process refers back to an earlier unevidenced development capacity figure, with no alternatives offered to the public in a series of consultation exercises. Such an approach, in our view, is unsound and unjustified.</p>
114	973	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Integrated Impact Assessment		<p>Inadequate consideration of alternative options in the Integrated Impact Assessment/SEA (Paragraph 7 above)</p> <p>At no stage in the process of preparation of the OPDC Local Plan has there been an adequate analysis of alternative spatial strategies for this part of London. It has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require.</p> <p>The Integrated Impact Assessment prepared for the FALP in 2013 (by consultants AMEC) included a very superficial review of 'Spatial Development Options' for Old Oak, at pan London level. Subsequent IIAs/ SEAs prepared for OPDC (including that from Arcadis as supporting study 28 to the 19.2 Draft Plan) have simply treated the 24,000 Mayoral housing targets as a foregone conclusion and argued that there are 'no reasonable alternatives' to be assessed (see 7.3 above).</p>
82	1378	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Integrated Impact Assessment		<p>2.6 The remainder of this consultation response covers those parts of the 19.2 Draft Local Plan where we consider the proposed policies to be unsound and/or unjustified. These are:</p> <p>Inadequate consideration of alternative options in the Integrated Impact Assessment contrary to EU requirements for Strategic Environmental Assessments.</p>
82	1404	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Integrated Impact Assessment		<p>7.1 The NPPF and National Planning Practice Guidance requires that Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role through-out the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives. Paragraph: 016 Reference ID: 12-016-20140306.</p> <p>7.2 The OPDC has published its sustainability appraisal as part of a document titled Integrated Impact Assessment and Habitats Regulation Assessment (Supporting Study No.28). This document has been prepared by the consultancy Arcadis. The report is an updating of that provided for the Regulation 18 and 19.1 consultations.</p> <p>7.3 Paragraph 3.4 of the document acknowledges that It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options have been assessed using the IIA Framework. This paragraph states 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 that the preferred option was 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 Opportunity areas are 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. The text continues:</p> <p>In light of these strategic planning documents defining the housing and jobs targets for the Old Oak and Park Royal, alternative development capacities are not considered to be reasonable alternatives and have therefore not been assessed (our emphasis).</p> <p>7.4 It appears that this paragraph has been added to the 19.2 version of the Integrated Impact Assessment following responses to the 19.1 version of the Local Plan which flagged up the lack of consideration of alternative options on key issues such as development capacity and housing densities, throughout the OPDC Local Plan process, from the 2015 OAPF to the present. This does not seem an adequate approach to the examination of reasonable alternatives as required by a SEA.</p>

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
82	1405	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Integrated Impact Assessment		7.5 The Integrated Impact Assessment prepared for the FALP in 2013 (by consultants AMEC)3 includes a brief section on 'Spatial Development Options' at paragraph 2.3.1 (as referred to by Arcadis above). Three options are dismissed with a few lines on each. The fourth and preferred option is based on accommodating growth within London's boundaries but without strategic extensions on to the Green Belt or open land. The paragraph goes on to note In addition a review of the housing potential within the Opportunity Areas shows significant potential for additional housing capacity. For example, the potential investment and alterations resulting from Crossrail and HS2 has resulted in the number of homes projected for Park Royal / Old Oak Common / Willesden Junction increasing from 1,500 to 19,000. 7.6 This surely cannot be a proper SEA 'testing' of four pan London options, as is claimed in the latest version of the Arcadis IIA. Nor does it begin to approach a testing of specific options at Old Oak. It is a simplistic conclusion that future development at Old Oak should be planned in a context of meeting a large share of London's projected housing need without encroachment on the Green Belt. And the housing number cited is not 24,000 but 19,000, a significant difference.
82	1406	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Integrated Impact Assessment		7.7 These matters are covered in Appendix C of the 2018 IIA prepared by Arcadis (pages not numbered). This appendix comments on the 15 consultation responses from local groups and individuals to the IIA for the 19.1 OPDC Local Plan, all of which questioned the lack of consideration of alternatives on development capacity. The consultants repeat the position adopted by OPDC in stating 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. To local people, this makes a mockery of EU requirements on SEAs as well as the statutory requirements for consultation on Local Plans. 7.8 Hence the IIA/SEA supporting the 19.2 Draft repeats the pattern cited above, whereby each stage of the OPDC planning process refers back to an earlier unevicenced development capacity figure, with no alternatives offered to the public in a series of consultation exercises. Such an approach, in our view, is unsound and unjustified.
82	1415	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Integrated Impact Assessment		Inadequate consideration of alternative options in the Integrated Impact Assessment/SEA (Paragraph 7 above) At no stage in the process of preparation of the OPDC Local Plan has there been an adequate analysis of alternative spatial strategies for this part of London. It has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require. The Integrated Impact Assessment prepared for the FALP in 2013 (by consultants AMEC) included a very superficial review of 'Spatial Development Options' for Old Oak, at pan London level. Subsequent IIAs/SEAs prepared for OPDC (including that from Arcadis as supporting study 28 to the 19.2 Draft Plan) have simply treated the 24,000 Mayoral housing target as an foregone conclusion and argued that there are 'no reasonable alternatives' to be assessed (see 7.3 above).

Integrated Water Management Strategy

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
47	610	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea		Integrated Water Management Strategy		The following comments made on the Integrated Water Management Strategy supporting document have not been taken forward: 4.1.4 Developed Scenario Further detailed information should be included to understand the impact on the Counters Creek system. Figure 4-6 could be modified to include the pre- and post-development capacity in the sewer system by adding a new column. 4.2 Peak Instantaneous Water Flows The reference to the capacity problems of the Counters Creek and the need to reduce surface water run-off entering the sewer system to at least greenfield run-off is welcome. This section explains that the estimated peak instantaneous sewer discharge will increase about five times. It will be useful to understand how that will affect the existing capacity of the sewers in terms of percentage.

Old Oak North Development Framework Principles

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
28	771	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		It is important to emphasise that the level of development and densities envisaged for Old Oak North will require good public transport connections and strong support for sustainable and active travel modes. The London Plan sets out the expectations around 'good growth'. So any approach in Old Oak North must demonstrate how the appropriate levels of public transport accessibility, connectivity and capacity will be achieved. We welcome that this is reflected in your development framework principles as is the importance of: - ensuring delivery of significant bus network improvements; - securing high quality and direct links for pedestrians, cyclists and buses to Willesden Junction Station and to the proposed new Old Oak Common HS2/Elizabeth Line/Network Rail Station; - delivering enhancements at Willesden Junction station

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
28	772	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		Whilst also recognised in your document, it is worth emphasising that TfL supports the preferred option of a viaduct and potential new station at Hythe Road to enable improved North-South connectivity across the area. The benefits of this solution have been demonstrated through TfL's business case work and the public consultation carried out in autumn 2017 showed significant public support for the proposals.
28	773	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		It is also important to emphasise that with either a viaduct or embankment approach it will be critical that north-south connectivity is provided for double deck buses to enable buses to serve both the Old Oak North development area and the HS2 Station Eastern link.
28	774	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		Ensuring high quality north-south connectivity for pedestrians and cyclists, and creating a high quality urban realm for residents and other users of the area, will also be critical outcomes for this area.
28	775	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		Furthermore should a viaduct solution be taken forward, the opportunity to enable future delivery of Hythe Road station should be protected and therefore, as a minimum, passive provision for Hythe Road Station should be made within its design and construction.
28	776	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		The development framework refers to a new two-track viaduct as your preferred approach. TfL current position is that the latest Hythe Road station and viaduct design (that has received Network Rail Approval in Principle) which included a three-track viaduct and station is the most preferable option to take forward. It provides additional connectivity, capacity and operational flexibility benefits in comparison to a two track viaduct and station design solution. This is particularly the case given the likely future increases in rail services on the West London Line.
28	777	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		We have previously confirmed that this project is not fundable by TfL and highlighted the need to secure funding from other sources. In this challenging funding context we understand the need to consider alternative and lower cost delivery solutions such as a two track viaduct and station design. We are happy to work with you to look further at these. However, it is worth reiterating that as a new design, a two track viaduct and station would have to gain Network Rail approval through GRIP. There is no guarantee this approval would be provided and we believe issues such as timetable modelling could be a particular risk. Therefore it is important that until Network Rail approvals have been achieved nothing should be done to preclude the delivery of the currently approved design.
28	778	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles		TfL is pleased to note the requirement that the three key routes described under PR1 and the bridges/underpasses referred to in section 5.2 should be constructed to adoptable standards for adoption by the relevant local highway authority. However, it is important that appropriate contractual rights of way and clarity on management and maintenance are established from the outset for all routes and connections (including cycle and pedestrian routes) to ensure that access is not compromised. This is particularly important because of the long build out period for many of the sites.
28	779	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	3.3.2 PR1 Key routes and servicing	TfL suggests rewording the principle as follows: - "(a) contribute to and enable delivery of new transport infrastructure and services to ensure the area has good public transport connectivity, the highest level of public transport access (6a/6b) and adequate public transport capacity - (c) ensure the design and function of streets and development contribute to the delivery of Healthy Streets and encourage use of active and sustainable modes of travel" It is important that all streets and connections in Old Oak North (including cycle and pedestrian routes) are built to an adoptable standard and are constructed and managed in accordance with TfL and local highway authority standards as specified in draft Local Plan policy T1 (including TfL's recommended amendments). This will be necessary to protect bus access and performance and to deliver Healthy Streets.
28	780	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	3.3.2 PR1 Key routes and servicing Paragraph 1	Paragraph 1 – Suggest amending text to specify ensuring connections to Old Oak Common Station (to provide access to HS2, Elizabeth Line and GWML services)
28	781	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	3.3.3 PR2 Bus Network	TfL welcome supportive policies aimed at ensuring a high quality bus network
28	782	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	3.2.4 PR3 Walking and Cycling	Suggest rewording principle d. to: a north-south walking and cycling route from Willesden Junction Station, through Harlesden Place, Oak Park, over Old Oak Bridge and onto Wormwood Scrubs or to Old Oak Common Station
28	783	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	3.2.4 PR4 Bridges and Underpasses	Suggest amending supporting text to emphasise importance that these bridges and underpasses include provision for high quality walking and cycling facilities as many will be critical gateways into the development area. Acknowledge that this is reflected in requirements in Appendix 5.2.
28	784	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	3.2.4 PR4 Bridges and Underpasses	Suggest that it is worth noting in the supporting text that the bridge/underpass footprints/alignments shown in this document are indicative and that further work is required, working with Network Rail, TfL, Canals and Rivers Trust and other stakeholders to confirm their feasibility and to develop design proposals.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
28	785	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	3.2.4 PR4 Bridges and Underpasses	It is critical that the existing and new Bridges and Underpass Structures S01, S02, S04, S05, S08, S09 are constructed or upgraded so that they can accommodate double deck buses. This is required to support delivery of the bus strategy and ensure operational efficiency and resilience. Whilst this requirement for individual structures may be referred to in various locations in the document TfL requests that there is a single supporting text statement in either PR2 or PR4 that specifically lists the bridges and underpasses in Old Oak North that will need to accommodate double deck buses. Suggested text: "Park Bridge, Park Road Underpass, Hythe Road Viaduct, Hythe Road Underpass, Laundry Bridge and Old Oak Bridge are all structures that will have key bus routes passing over or below them. As such they will all need to be delivered (or upgraded) to be able to accommodate double deck buses"
28	786	Strategic Partner	Lucinda	Turner	Transport for London		Old Oak North Development Framework Principles	PR5 West London Line	See general comments above in relation to a two track viaduct
119	859	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Old Oak North Development Framework Principles		This is a new supporting Study that adds little clarification as to the nature and function of Wormwood Scrubs Street or the location of Access points from the north. There is inconsistency in the figures, Fig 9 appears to show a direct access into the scrubs with other illustrations e.g. Fig 19 stopping just short of the boundary Fig 9, Fig 28 and others need to be revised to make clear that: • Any access from the station enters Wormwood Scrubs Street (WSS) not wormwood scrubs itself. • access from Old Oak via the bridge enters Wormwood Scrubs Street (WSS) not wormwood scrubs itself.
119	860	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Old Oak North Development Framework Principles		The northern embankment is one of the more sensitive habitats on the Scrubs. Access points to the Scrubs including from the bridge will be considered as part of the GIOSSMP. Supporting text should clarify: WSS connects with Old Oak Common Lane (OOCL) in the west or Scrubs lane (SL) in the east with no connections into wormwood Scrubs. Access to the scrubs would be from OOCL or SL and will be considered as part of the GIOSSMP
114	948	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Old Oak North Development Framework Principles		8.6 One of the supporting studies (Old Oak North Development Framework Principles) lifts the curtain slightly on an important part of the OPDC area, where Cargiant/London Regional Properties have their major landholding. This area is amongst the first scheduled to be built out in the Plan's phasing. 8.7 This document identifies principles for development capacity, and shows diagrams of indicative building heights and massing (with limited men on of storey heights). It is drafted by AECOM and reflects work undertaken by the AECOM led team on a masterplan for this part of Old Oak. This exercise has followed masterplan work undertaken by Cargiant/London & Regional Properties. It is a test of the 24,000-housing target set for Old Oak in 2015, and in our view the outcome of this test should feed-back into a substantive rethink of this particular Mayoral aspiration. The figure is too high for sustainable development and liveable communities. 8.8 . The Principles and Performance Requirements for Residential Development in the AECOM study repeat the OPDC policies of delivering a mix of housing at 'high' (while unspecified) densities, including tall buildings (of unspecified heights). Section 3.6 of the document on Development Capacity and Building Heights becomes more specific. This identifies and maps a series of 'development plots' with 'performance requirements' that require proposals to: a. contribute to the total delivery of 7,300 new homes and 3,900 new jobs within the place of Old Oak North; and b. contribute to the delivery of a minimum of 6,500 new homes and 3,600 new jobs within the place of Old Oak North during the Local Plan period. 8.9 The accompanying text states The average density will be 600 units per hectare. This will vary across the place in response to public transport access, sensitive locations and site-specific circumstances. These densities are of a scale that have only recently been delivered in London and will contribute to the form of a new London typology (our emphasis). It will be critical that the design of development and publicly accessible open spaces are of the highest design quality and supported by a range of community and commercial uses. The principles in this document have been developed to deliver these aspirations. 9. No rationale is offered to why Old Oak North should be a test bed for a new form of London building typology, other than that this is necessary to adhere to a seemingly arbitrary target set under a previous Mayor. The framework document simply repeats at 3.1.1 high density development, including tall buildings, will be required to deliver the new homes and jobs targets set for Old Oak Opportunity Area by the Mayor's London Plan. This cannot surely be evidence-based justification, in planning terms? It will become a social experiment, unknown in London. 9.1 What this document does demonstrate is how the original aspirations for an Old Oak developed at densities ranging from 300-600 units per hectare have had to be revisited as detailed work on the Draft Plan and related masterplanning has proceeded. In successive iterations of the planning process, it has become clear that this earlier density range would not deliver what the original 2015 London Plan housing target requires.
56	1134	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR1	The document states that all key routes should be designed to adoptable standards for adoption by the local planning authority. An adoption strategy is required and should be agreed with the local highway authority. Adoption Strategy required (see comments on transport section).
56	1135	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR1	Key routes is described vaguely and is not obvious in what mode of travel is being discussed.
56	1136	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR3	Removal of the words 'where feasible'. A high quality segregated cycling route along Scrubs Lane is essential.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1137	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR14	Defines 8-12 storey shoulder/podium heights, increased from 6-10 storeys for development, tall buildings to be appropriate across the area – we are concerned that the overall general increase of building shoulder heights coupled with prescribing tall elements within each cluster and building block may result in an undefined wall of large scale development that would have a harmful impact on the skyline and on the OPDC objectives to aid legibility and wayfinding. This effects of a lack of (skyline) modelling can be seen already in North Acton.
56	1138	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR2	The key does not cover all colours marking the routes around Old Oak North. Would there be no bus route between Hythe Road and Willesden Junction?
56	1139	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR8	The text on page 33 reads “The centre at Old Oak North should be formed of a series of focused locations of town centre uses distributed through the development.” There seem to be a too large number of town centre locations and focused locations of activity, and altogether it appears rather unfocused. Is the quantity of such locations realistic in future, is it based on evidence given that town centres suffer more and more with unoccupied spaces?
56	1140	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR6	The Birchwood Nature Reserve (in the key) is not marked on the map.
56	1141	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR6	Clarify the term “green street” – is this more than a tree lined street, e.g. including green strips/SUDs or similar?
56	1142	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak North Development Framework Principles	PR6	How can the North -South ped-cycle link through Oak Park be made safe at night without compromising the biodiversity value of the park and also compromising availability of space for playing fields that cannot be provided elsewhere due to lack of space? The route through the park seems unrealistic as main route and it appears that Old Oak Street would become the main ped-cycle route.
82	1390	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Old Oak North Development Framework Principles		<p>4.19 One of the supporting studies (Old Oak North Development Framework Principles) lifts the curtain slightly on an important part of the OPDC area, where Cargiant/London Regional Properties have their major landholding. This area is amongst the first scheduled to be built out in the Plan's phasing.</p> <p>4.20 This document identifies principles for development capacity, and shows diagrams of indicative building heights and massing (with limited mention of storey heights). It is drafted by AECOM and reflects work undertaken by the AECOM led team on a masterplan for this part of Old Oak. This exercise has followed masterplan work undertaken by Cargiant/London & Regional Properties. It is a test of the 24,000 housing target set for Old Oak in 2015, and in our view the outcome of this test should feed back into a substantive rethink of this particular Mayoral aspiration. The figure is too high for sustainable development and liveable communities.</p> <p>4.21 The Principles and Performance Requirements for Residential Development in the AECOM study repeat the OPDC policies of delivering a mix of housing at 'high' (while unspecified) densities, including tall buildings (of unspecified heights). Section 3.6 of the document on Development Capacity and Building Heights becomes more specific. This identifies and maps a series of 'development plots' with 'performance requirements' that require proposals to:</p> <p>a. contribute to the total delivery of 7,300 new homes and 3,900 new jobs within the place of Old Oak North; and</p> <p>b. contribute to the delivery of a minimum of 6,500 new homes and 3,600 new jobs within the place of Old Oak North during the Local Plan period.</p> <p>4.22 The accompanying text states The average density will be 600 units per hectare. This will vary across the place in response to public transport access, sensitive locations and site specific circumstances. These densities are of a scale that have only recently been delivered in London and will contribute to the form of a new London typology (our emphasis). It will be critical that the design of development and publicly accessible open spaces are of the highest design quality and supported by a range of community and commercial uses. The principles in this document have been developed to deliver these aspirations.</p> <p>4.23 No rationale is offered to why Old Oak North should be a test bed for a new form of London building typology, other than that this is necessary to adhere to a seemingly arbitrary target set under a previous Mayor. The framework document simply repeats at 3.1.1 high density development, including tall buildings, will be required to deliver the new homes and jobs targets set for Old Oak Opportunity Area by the Mayor's London Plan. This cannot surely be evidence-based justification, in planning terms?</p> <p>4.24 What this document does demonstrate is how the original aspirations for an Old Oak developed at densities ranging from 300-600 units per hectare have had to be revisited as detailed work on the Draft Plan and related masterplanning has proceeded. In successive iterations of the planning process, it has become clear that this earlier density range would not deliver what the original 2015 London Plan housing target requires.</p>

Old Oak Strategic Transport Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1273	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Old Oak Strategic Transport Study		Excluding the front cover, this document is from 2015 and would like to know if this has been updated at all?

Precedent Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
119	851	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Precedent Study		Precedence study could be expanded to include an example of large existing open space within a regeneration project
110.b	1438	Community Group	Robin	Brown	Grand Union Alliance		Precedent Study		The relevant London precedents established in the Precedents study (2017, Regulation 19 consultation document 35) do not relate to the challenges of bringing the OPDC site forward for development and not to the specific financial and infrastructural demands being placed on the sites in the OPDC area.

Scrubs Lane Development Framework Principles

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
56	1151	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Scrubs Lane Development Framework Principles	Principle 3	Para.4.4 should reference the need for contributions to road maintenance as well as delivery. Amend Para 4.4 as follows:- “development along Scrubs Lane will need to contribute towards their delivery and maintenance”
56	1152	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Scrubs Lane Development Framework Principles	Principle 3	Para 4.4 mentions LBHF and local highway authority as if they are separate entities.
56	1153	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Scrubs Lane Development Framework Principles	Principle 3	Add reference to the word ‘minimum’ regarding segregated cycle paths’. Amend para 4.5 as follows:- “Regarding segregated cycle paths ‘Minimum 4m wide’ which allows for potential planting between segregation of cars and cyclists.

Social Infrastructure Needs Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
76.b	177	Strategic Partner	Duncan	Green	Diocese of London		Social Infrastructure Needs Study	2.22	2. We are concerned that the gap analysis completed by AECOM (p.3 2.22) did not identify there may be insufficient health services in light of the emerging community. These include provision of sufficient A&E and GP services, as well as easy access to them. One potential solution would be to ensure that the proposal to close both Charing Cross and Ealing hospitals be reversed, otherwise new health services (including A&E services), would need to be established.
76.b	178	Strategic Partner	Duncan	Green	Diocese of London		Social Infrastructure Needs Study	4.10	3. Based on the reports thus far, we are not sure there will be sufficient and appropriate car parking facilities available for healthcare and school staff, as well as and including provision for the physically disabled. Thus far, the Social Infrastructure report states that key themes emerging from some examples in relation to Case studies (4.10), include minimal or no car parking.
42	226	Planning Consultant	Jonathan	Smith	DP9	Old Oak Park Limited	Social Infrastructure Needs Study		We note that the Education and Health Needs Study adopts a GLA methodology for calculating population and child yield which we believe produces numbers which are too high. We would note the following factors as being likely to lead to a reduced population and child yield: · Viability and urban design constraints mean that in reality a lower proportion of affordable housing and family housing are likely, which means that the actual population (particularly the number of children) is likely to be much lower than the evidence base suggests; · The application of the model would be made more sound with the following adjustments: - 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 the fact that flatted developments have a higher proportion of pre-school children relative to school aged children - 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

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
217	364	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	2.22	"P3 2.22 AECOM were asked to produce a high-level gap analysis regarding previous studies. The themes were: Early years education provision, use of existing school places off-site, dentists provision and acute hospital bed provision. Based on an additional 27,000 homes and 60,000 people (now an additional 20,000 homes and 44,000 people)." JL: Why wasn't access to A&E departments included? We know this is already a problem with the current population around the OPDC area since the closure of Hammersmith Hospital A&E and Central Middlesex Hospital A&E department. The remaining A&E departments: St Mary's; Charing Cross and Northwick Park cannot cope during busier times, all year round, with ambulances backing up outside A&E departments waiting to hand over acutely ill patients. Walk-in Centres, Urgent Care Centres and the planned expansions to Centres for and Care cannot provide for acutely ill patients and those with major trauma. In addition to which, the NWL Sustainability and Transformation Plan (STP Oct 2016) includes the closure of both Charing Cross and Ealing Hospitals. The London Ambulance Service consistently fails its response times due to the congestion at the A&E departments named here so stopping the closure of Charing Cross and Ealing Hospitals is a significant gap in these plans that has been overlooked. Failure to stop these closures will cost lives. JL: We need a commitment from Imperial College Healthcare NHS Trust and NWL Commissioning Groups, that the proposed closure of Charing Cross Hospital, in particular, will be removed from the STP.
217	365	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	2.22	JL: Proposed Health Centre on the Car Giant site should work well provided the conditions above are met.
217	366	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	2.3	2.3 Political and Development Context Government spending on health. JL: The recent announcement of a small amount of additional funding will only address a small proportion of the lack of funding in the NHS over the past 8 years. The NWL Sustainability and Transformation Plan (Oct 2016) recognises significant pressure on the whole system, to be addressed in part by transformation of General Practice "operating at scale through networks, federations of practices or super-practices." (This is also repeated in 5.1 p32). "Primary care providers, working jointly with social care and the wider community, are at the heart of the new system to deliver integrated care." JL: This is very worrying because the Clinical Commissioning Groups, responsible for commissioning community health services and the local authorities who are responsible for social care, do not have sufficient funding available to invest in new systems to relieve the identified pressure. Furthermore, the assumption that bringing both underfunded health and social care together will produce a system of efficient and effective integrated care is at best unproven and a high risk strategy.
217	367	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	2.3	"The current assumptions for education, health, community and emergency facilities in this report are based on discussions with service providers during spring 2018. Were national or regional policy to shift or local priorities to change, the assumptions within this study would become outdated. There is therefore a need for OPDC to continually engage with service providers to understand their requirements and OPDC propose to keep information on any infrastructure requirements regularly updated within an Infrastructure Delivery Plan." JL: Good but service users should also be consulted.
217	368	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	2.4	"2.4 AECOM 2018 Study Objectives The agreed scope of work for the 2018 Social Infrastructure Needs Study (SINS) for the themes of education, health, community space and emergency services provision is as follows: 2.4.2 Health 4. Advise OPDC on health facility delivery mechanisms, procurement options, funding options including securing funding from development, Central Government and health agencies, and the role of OPDC in the delivery process alongside other stakeholders." JL: Local residents must be involved as key stakeholders.
217	369	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	4	4. Education 4.10 Case Study Examples of High Density & Mixed Use School Designs Key themes emerging from a review of the examples include: • Minimal or no car parking and use of cycle and scooter parking. JL: I'm sure we all agree that minimising vehicle emissions around schools is important but we need to be aware that even though a lot of homework may be on-line now, children still need to learn to read and write and so teachers still have heavy and bulky books to mark and carry to and from school. We don't want to make these schools so unattractive that we can't recruit and retain good teachers. So some parking facilities will be needed for them.
217	370	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	5.2	"5.2 Health – Engagement Brent, Ealing, Hammersmith and Fulham and West London CCGs commissioned Imperial College Health Partners (IHP) to support them to agree a health service delivery strategy for the OPDC Area." JL: The key points/statements from the strategy are set out below:- Given the new transport links and increased office space, consideration should also be given to a potentially large daytime working population using the local health services in addition to the resident population. JL: This will be crucial in order for the already underfunded services not to be overwhelmed.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
217	371	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	5.2	"The London Borough of Hammersmith and Fulham is committed to multidisciplinary working between health and social care including the development of joint service hubs at key GP practices. The Council has therefore requested provision for social care services staff to have access to touch down points and meeting rooms in the health facility in Old Oak. The CCGs have confirmed that the modelling of space for community services incorporates this provision." JL: This could work well but will require staff/stakeholder engagement at an early stage. The plan to include dental and pharmacy on site should work well; also the planned café, gym, leisure/sport, retail/commercial space. But consideration should be given to users of all ages. LBHF longer term strategy for a large health facility at Old Oak North or Old Oak South by 2038 again should be developed with resident stakeholder engagement.
217	372	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	5.5	5.5 Off-site Expansion According to the NWL Shaping a Healthier Future programme, Central Middlesex Hospital (CMH) will be a Health and Wellbeing Hub + with the focus on elective care. JL: The A&E department has already closed causing remaining A&E departments around the OPDC area to become overwhelmed.
217	373	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	5.5	"Two GP practices close by closed and were replaced by one new practice. Park Royal Medical Practice is the new Primary Care Centre that opened at CMH 01.03.18. Hammersmith Centre for Health (HCFH) in Hammersmith Hospital is suitable for expansion. Cloister Road Surgery can expand to accommodate the expected population growth in North Acton and Park Royal. Brent CCG identified Willesden Centre for Health and Care (WCHC) to increase capacity of primary care services to support early population growth within Old Oak – cost approximately £1million. (ref: 47 SINS 2018 O)" JL: This may not be enough because WCHC is too far north of the OPDC area and the assumption that residents north of the OPDC area will switch GP to WCHC, relieving pressure on the remaining practices is unrealistic because we know that, like banks, residents don't generally change GP practice unless they move out of the area. The only hope is that the turnover of residents north of the OPDC area is sufficient so that GP's currently immediately north of the OPDC area will have some capacity freed up to be able to take on residents new to the area.
217	374	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	Section 5.10	"5.10 Case Study Examples of High Density & Mixed Use Health Designs Key themes emerging from a review of the examples include: • Minimal or no car parking and use of cycle and scooter parking." JL: The assumption that this is appropriate for all staff within the health facility is wrong. Some community health staff e.g. District Nurses, work more effectively and efficiently when they are able to use a car for their home visits. Parkview Centre for Health and Wellbeing, White City, is given as an example; there is no parking for healthcare workers so all the nurses and healthcare assistants have to walk to all of their patients. This reduces efficiency. Also, there is no where for dropping off and picking up patients attending appointments in the health centre; therefore accessibility is poor for people with physical disabilities.
217	375	Local Resident	Jean	Lewis			Social Infrastructure Needs Study	7.1.1.3	7. Emergency Services provision 7.1.1.3 Ambulance Service JL: With no A&E department at Hammersmith Hospital or Central Middlesex Hospital, the nearest A&E departments are Charing Cross Hospital and Northwick Park. We must have assurance that Charing Cross Hospital will not close. Closure plans must be removed from the NWL STP. Imperial Healthcare NHS Trust and the NWL CCG's must confirm this. Otherwise, for reasons explained above, ambulance services cannot meet response targets, even with the planned extensions to existing ambulance stations.
56	1286	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Social Infrastructure Needs Study		The CCG's preferred approach for primary health care needs is for one central health hub facility (including social care/mental health facilities) to be delivered in Old Oak North in 2024 (Cargiant site). The Hammersmith Centre for Health at Hammersmith Hospital is also identified for potential expansion to support early population growth. In terms of secondary/acute health care needs, LBHF has serious concerns that secondary/acute healthcare needs arising from development within OPDC area have been completely overlooked. The suggestion that existing hospital provision will be able to accommodate the demands for acute care from an extra 50,000 residents requires evidencing. LBHF strongly consider that further work is required to project the acute care needs of this increased population.
56	1289	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Social Infrastructure Needs Study		The Education modelling is based on 25% Affordable Rent, when the Local Plan policy requirement is 30%. LBHF notes the on-going work with the OPDC on the matter of education provision. LBHF, Brent and Ealing previously submitted a joint letter on this matter. The Council still refers to this letter to be discussed at the Examination. The Council also consider that the matter of education provision highlights the importance of joined up working with the outlying boroughs and the need for a cross-borough working to discuss CIL/S106 matters in a strategic and proactive manner.

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110.b	1538	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		Scope of Study: early years' education provision, use of existing school places off-site, dentists' provision and acute hospital bed provision were the subject of this study, whilst access to A&E departments was not directly addressed. There is already a problem with the current population around the OPDC area accessing A&E since the closure of Hammersmith Hospital A&E and Central Middlesex Hospital A&E department. The remaining A&E departments: St Mary's, Charing Cross and Northwick Park cannot cope during busier times, all year round, with ambulances backing up outside A&E departments waiting to hand over acutely ill patients. Walk-in Centres, Urgent Care Centres and the planned expansions cannot provide for acutely ill patients and those with major trauma. In addition to which, the North West London (NWL) Sustainability and Transformation Plan (STP) (Oct 2016) includes the closure of both Charing Cross and Ealing Hospitals. The London Ambulance Service consistently fails in its response times due to the congestion at the A&E departments identified above. The omissions to consider A&E access and recommend that the facilities at Charing Cross and Ealing Hospitals remain open are highly significant. Closures will cost lives. Only if they continue to function will the proposed Health Centre in Old Oak North work well. What is needed is a commitment from Imperial College Healthcare NHS Trust and NWL Commissioning Groups, that the proposed closure of Charing Cross Hospital, in particular, will be removed from the STP.
110.b	1539	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		2.3 Political and Development Context: The NWL STP recognises significant pressure on the whole system, to be addressed in part by transformation of General Practice "operating at scale through networks, federations of practices or super-practices." (This is also repeated in 5.1 p32). "Primary care providers, working jointly with social care and the wider community, are at the heart of the new system to deliver integrated care." Dependence on transformational change is of great concern because the Clinical Commissioning Groups, responsible for commissioning community health services, and the local authorities, who are responsible for social care, do not have sufficient funding available to invest in new systems to relieve the identified pressure. Furthermore, the assumption that bringing both underfunded health and social care together will produce a system of efficient and effective integrated care is at best unproven and a high risk strategy. The OPDC should not compose and bring forward plans for the health needs of its area in isolation seemingly without regard to the realities of the health system. The stated recognition that there is a need for OPDC to continually engage with service providers to understand their requirements and for the OPDC to propose to keep information on any infrastructure requirements regularly updated within an Infrastructure Delivery Plan is welcomed. But service users and local residents within and surrounding the OPDC should also be consulted and involved – Policy SP2 h) and para 11.34 set the policy framework for this.
110.b	1540	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		Other themes of SINS: 4 Education: 4.10 Case Study Examples of High Density & Mixed Use School Designs: Reservations have been expressed at the stacking of residential storeys above schools, podium and roof top playgrounds. In keeping with Policy SP2 h) and para 11.34 together with other guidance on public involvement, the OPDC should better inform communities, existing and new, on innovative approaches with, for example, tours of precedents, in order that they may be better able to comment. At the very least the Community Review Panel should reflect on building typologies/ building types and other components of the built and natural environment and not just pre-planning application proposals.
110.b	1541	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		On the specific point of Minimal or no car parking and use of cycle and scooter parking, minimising vehicle emissions around schools is very important but teachers still cart around heavy and bulky books to mark. We do not want to make these schools so unattractive that we cannot recruit and retain good teachers. Some parking facilities will be needed for them.
110.b	1542	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		5.2 Health – Engagement: health service delivery strategy for the OPDC Area: Imperial College Health Partners (ICHP) was commissioned by Brent, Ealing, Hammersmith and Fulham Councils and West London CCGs to support them to agree a health service delivery strategy for the OPDC Area. This set out that consideration should also be given to a potentially large daytime working population using the local health services in addition to the resident population. This will be crucial in order for the already underfunded services not to be overwhelmed.
110.b	1543	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		The provision for social care services staff facilities at the Old Oak Health Centre: This could work well, but this, and the longer strategy for the Centre's range of services and operation, will require staff/stakeholder engagement at an early stage. As for the range or composition of services and facilities at or collocated with the health centre, the indicated mix of dental, pharmacy, café, gym, leisure etc. is stimulating, but this needs to be explored in conjunction with stakeholders/ residents.
110.b	1544	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		5.5 Off-site Expansion: According to the NWL Shaping a Healthier Future programme, Central Middlesex Hospital (CMH) will be a Health and Wellbeing Hub and with the focus on elective care. This is all well and good, but its A&E department has already closed causing remaining A&E departments around the OPDC area to become overwhelmed.
110.b	1545	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		Other highlights that we want to comment on include: Two GP practices close by closed and were replaced by one new practice. Park Royal Medical Practice is the new Primary Care Centre that opened at CMH, March 2018. Hammersmith Centre for Health (HCFH) in Hammersmith Hospital is suitable for expansion. Cloister Road Surgery can expand to accommodate the expected population growth in North Acton and Park Royal. Brent CCG identified Willesden Centre for Health and Care (WCHC) to increase capacity of primary care services to support early population growth within Old Oak at a cost approx. £1million (ref: 47, SINS 2018). This may not be enough because WCHC is too far north of the OPDC area and the assumption that residents north of the OPDC area will switch GP to WCHC, relieving pressure on the remaining practices is unrealistic Residents do not generally change GP practice unless they move out of an area. There are problems in attempting to change GPs. Any workable solution would be dependent on the turnover of residents north of the OPDC area to be of a sufficiently high level. Then GPs currently immediately north of the OPDC area will have some freed up capacity to be able to take on residents new to the area. This is totally unpredictable and beyond influences that OPDC may apply. What is needed is a proper and adequate distribution of health services, including GP practices across the OPDC and beyond in the hinterland. OPDC's responsibilities do not end at its boundary.
110.b	1546	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		There appears to be different perceptions as to Cloister Road Clinic between the OPDC / SINC and local residents who contend that it is already oversubscribed and that offsite expansion is impractical.

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110.b	1547	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		5.10 Case Study Examples of High Density & Mixed Use Health Designs: On the specific point of Minimal or no car parking and use of cycle and scooter parking, the assumption that this is appropriate for all staff within the health facility is wrong. Some community health staff, for example, District Nurses, work more effectively and efficiently when they are able to use a car for their home visits. Parkview Centre for Health and Wellbeing, White City, is given as an example. There is no parking for healthcare workers so all the nurses and healthcare assistants have to walk to all of their patients. This reduces efficiency. Also, there is no-where for dropping off and picking up patients attending appointments in the health centre; therefore accessibility is poor for people with physical disabilities and as stated elsewhere such limitations may raise acting reasonably and equality concerns.
110.b	1548	Community Group	Robin	Brown	Grand Union Alliance		Social Infrastructure Needs Study		7. Emergency Services provision: 7.1.1.3 Ambulance Service: With no A&E departments at Hammersmith Hospital or Central Middlesex Hospital, the nearest A&E departments are at Charing Cross Hospital and Northwick Park. A successful approach to the provision of health services in and around the OPDC area is dependent on, at least, Charing Cross Hospital not closing. Closure plans must be removed from the NWL STP. Otherwise, for reasons explained above, ambulance services cannot meet response targets, even with the planned additions to existing ambulance stations.

Tall Buildings Statement

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
114	952	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Tall Buildings Statement		10.2 Those of the public who seek further information from the supporting studies are none the wiser. The Tall Buildings Statement has been drafted with the new London Plan in mind, albeit that Examination of this new Plan has yet to take place. The new London Plan is not scheduled for final publication until Winter 2019/20. It seems likely that it will be the current London Plan and its Policy 7.7 on Location and Design of Tall and Larger Buildings against which OPDC Dra Policy D9 will need to be assessed at EIP.
114	953	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Tall Buildings Statement		10.3 The Tall Buildings Statement identifies a list of 9 'locations' at which tall buildings are deemed appropriate. These are in several cases very large areas rather than 'locations' (e.g. the whole of Old Oak North and Old Oak South). 10.4 Justification for tall buildings in these areas is based on their assumed future accessibility. The Tall Buildings Statement asserts that saying These (locations) will deliver the highest Public Transport Accessibility Levels (PTAL). It is argued that Old Oak will also be home to a new commercial centre for London, a new major town centre and a range of destination and catalyst uses. Therefore, tall buildings will enable Old Oak to reinforce the spatial hierarchy of the local and wider context by aiding legibility and way finding to these nationally and regionally significant designations. 10.5 Many Londoners remain unconvinced by the repeated case made by developers and planning authorities for the benefits provided by tall buildings in 'legibility and way finding'. We are no longer 16th century travellers seeking the reassuring sight of a cathedral spire. A majority of Londoners now carry a GPS enabled phone.
114	954	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Tall Buildings Statement		10.6 More importantly and as covered in the next section of this response, local residents are not persuaded that all those areas/locations listed in the Tall Buildings Statement will experience 'the highest PTAL levels', either by 2026 when Old Oak Common Station is due to be completed, or at any me in the future. Yet the OPDC draft policy of allowing very tall buildings in a series of 'clusters' along Scrubs Lane has already been used as 'emerging policy' to grant planning permissions in 2017 to a series of residential towers in Scrubs Lane—despite the StQW (and the MP for Hammersmith) arguing that such decisions were premature. The locations for two of these tower developments currently have PTAL levels of 1b (Mitre Yard, and North Kensington Gate). The proposed new Overground station at Hythe Road remains a very uncertain prospect.
114	955	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Tall Buildings Statement		10.7 The Tall Buildings Statement includes a section headed What are the general heights of tall buildings considered to be appropriate? In answer the document concludes that identifying general heights of tall buildings is not considered to be appropriate at this moment (paragraph 3.13). What me would be appropriate, given that the 19.2 Draft Plan is a last stage in consultation?
114	956	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Tall Buildings Statement		10.8 There is material in the Tall Buildings Statement on 'shoulder heights' and 'podium heights' (terms which mean little to the public) and some 'precedent' examples of 'high density' schemes elsewhere in London, for which densities are not cited. The table of developments already approved by OPDC (at page 13 of the Statement) quotes 'shoulder and/or podium' heights for a series of developments, but omits the 'tower' element in each case.
114	957	Residents Association	Ewa	Cwirko-Godycka	Midland Terrace Residents		Tall Buildings Statement		10.9 Coupled with other omissions of density figures and likely building heights throughout the very extensive suite of Local Plan documents, this appears to be a calculated attempt to suggest to the public that nothing above 15 storeys will be built at Old Oak. There is no mention in the Tall Building Statement of residential and student towers already approved by LB Ealing (within the OPDC boundary) at 40 storeys or more. There is no acknowledgment that areas such as Old Oak North, destined to be developed at an average density of 600 units/hectare, will inevitably see towers of 40—50 storeys if not more.
56	1170	Local Authority	Matt	Butler	London Borough of Hammersmith and Fulham		Tall Buildings Statement	Figure 2	Same comments as relating to Page 41 of Local Plan document, Figure 3.15 Sensitive Locations; and relating to Old Oak North Development Framework Principles (key recommendations, page 2). Generally this statement lacks evidence relating to visual impacts of tall buildings on sensitive locations, open and street spaces. The table of developments of similar building heights is useful and images should be included that convey an impression of impacts.
82	1394	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Tall Buildings Statement		5.2 Those of the public who seek further information from the supporting studies are none the wiser. The Tall Buildings Statement has been drafted with the new London Plan in mind, albeit that Examination of this new Plan has yet to take place. The new London Plan is not scheduled for final publication until Winter 2019/20. It seems likely that it will be the current London Plan and its Policy 7.7 on Location and Design of Tall and Larger Buildings against which OPDC Draft Policy D9 will need to be assessed at EIP.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
82	1395	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Tall Buildings Statement		5.3 The Tall Buildings Statement identifies a list of 9 'locations' at which tall buildings are deemed appropriate. These are in several cases very large areas rather than 'locations' (e.g. the whole of Old Oak North and Old Oak South). 5.4 Justification for tall buildings in these areas is based on their assumed future accessibility. The Tall Buildings Statement asserts that saying These (locations) will deliver the highest Public Transport Accessibility Levels (PTAL). It is argued that Old Oak will also be home to a new commercial centre for London, a new major town centre and a range of destination and catalyst uses. Therefore, tall buildings will enable Old Oak to reinforce the spatial hierarchy of the local and wider context by aiding legibility and wayfinding to these nationally and regionally significant destinations. 5.5 Many Londoners remain unconvinced by the repeated case made by developers and planning authorities for the benefits provided by tall buildings in 'legibility and wayfinding'. We are no longer 16th century travellers seeking the reassuring sight of a cathedral spire. A majority of Londoners now carry a GPS enabled phone.
82	1396	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Tall Buildings Statement		5.6 More importantly and as covered in the next section of this response, local residents are not persuaded that all those areas/locations listed in the Tall Buildings Statement will experience 'the highest PTAL levels', either by 2026 when Old Oak Common Station is due to be completed, or at any time in the future. Yet the OPDC draft policy of allowing very tall buildings in a series of 'clusters' along Scrubs Lane has already been used as 'emerging policy' to grant planning permissions in 2017 to a series of residential towers in Scrubs Lane—despite this Forum (and the MP for Hammersmith) arguing that such decisions were premature. The locations for two of these tower developments currently have PTAL levels of 1b (Mitre Yard, and North Kensington Gate). The proposed new Overground station at Hythe Road remains a very uncertain prospect.
82	1397	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Tall Buildings Statement		5.7 The Tall Buildings Statement includes a section headed What are the general heights of tall buildings considered to be appropriate? In answer the document concludes that Identifying general heights of tall buildings is not considered to be appropriate at this time (paragraph 3.13). What time would be appropriate, given that the 19.2 Draft Plan is a last stage in consultation?
82	1398	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Tall Buildings Statement		5.8 There is material in the Tall Buildings Statement on 'shoulder heights' and 'podium heights' (terms which mean little to the public) and some 'precedent' examples of 'high density' schemes elsewhere in London, for which densities are not cited. The table of developments already approved by OPDC (at page 13 of the Statement) quotes 'shoulder and/or podium' heights for a series of developments, but omits the 'tower' element in each case. These heights are shown in Table 1 of this response, above.
82	1399	Neighbourhood Forum	Henry	Peterson	St Quintin and Woodlands Neighbourhood Forum		Tall Buildings Statement		5.8 Coupled with other omissions of density figures and likely building heights throughout the very extensive suite of Local Plan documents, this appears to be a calculated attempt to suggest to the public that nothing above 15 storeys will be built at Old Oak. There is no mention in the Tall Building Statement of residential and student towers already approved by LB Ealing (within the OPDC boundary) at 40 storeys or more. There is no acknowledgment that areas such as Old Oak North, destined to be developed at an average density of 600 units/hectare, will inevitably see towers of 40—50 storeys if not more.

The Land at Abbey Road Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
118	173	Planning Consultant	Rory	McManus	Turley	Ashia Centur Limited	The Land at Abbey Road Study		It is noted that an updated Industrial Land Review Addendum (June 2018) and Development Options Appraisal Report (March 2018) has been prepared to support the updated draft Local Plan. Within the Development Options Appraisal Report prepared by CBRE, the Report explores a range of appraisal options but, recognises the findings are prepared on "the basis of a desktop basis with limited information and are informal, for guidance purposes only and are not a substitute for a formal valuation prepared in accordance with the RICS 'Red Book'." In the short period of time it has not been possible to prepare a detailed rebuttal to the Appraisal Report however, we would like to note that the Report will be challenged with respect to how the appraisal options have been appraised in particular subjective assumptions made and the lack of clear market evidence and inconsistency in terms of quantum of development. The conclusion set out in paragraph 9.6 of the Report that industrial use would be the most appropriate use is challenged and it is questioned why the report has been prepared in isolation from any dialogue with the owners or their advisors. Within the Addendum explicit reference is made to the request to that the site (identified as Site 3) should be removed from the SIL to allow delivery of the extant planning permission. The response is made that the site would be retained within the SIL "SIL compliant uses are appropriate in this location. There is ongoing demand for industrial space and the site is one of the largest sites within the designated SIL boundary. 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."

Victoria Road and Old Oak Lane Development Framework Principles

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
119	872	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Victoria Road and Old Oak Lane Development Framework Principles		The development objective to 'integrate places' will depend on the intention of a pedestrian friendly environment along Old Oak Common Lane. The vehicular route shown on Page 39 should presumably indicate a route down Braybrook street not accessing the Scrubs as shown? Supporting text should indicate that: This route should maximise the Green infrastructure potential for this zone (including hedges, tree planting signage and appropriate boundary treatment) and act as a buffer between the public realm and an area or biodiversity opportunity. Amend Vehicular route

Views Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
9.b	654	Statutory Consultee	Katie	Parsons	Historic England		Views Study	Heritage Views	<p>Background Evidence</p> <p>The Heritage Views section is very helpful, particularly in outlining key facts and images there are elements of analysis which could be supplemented particularly regarding the Grade I Registered Park and Garden of Kensal Green Cemetery. For example View 3 (west from Anglican Chapel in Kensal Green Cemetery) focuses mainly on sightlines within the cemetery itself and provides no assessment of its setting. The Guidelines paragraph for this site does go on to state that any new buildings within this view are likely to change the setting of cemetery, the same conclusions are drawn for sites 4, 5 and 6 (all views from the cemetery). However, there is little analysis of how this might affect the significance of the cemetery or to the extent of harm may be caused as a result of any changes. We are aware that it is the intention to create an area based SPD which will include Scrub's Lane, which we hope will provide the opportunity for some further analysis to be carried out.</p>
21.b	796	Planning Consultant	Nick	Sharpe	Montagu Evans	Boropex Holdings Ltd	Views Study	View 5	<p>View 5 from the Belgian War Memorial (Grade II) towards Cumberland Park</p> <p>"Elements in the view".</p> <p>The text states that... "Scrubs Lane overbridge can be seen in the distance to the south, a colourful single span bow string bridge, constructed of steel with purple and red engineering brick abutments. The bridge has a degree of aesthetic value and is a local landmark. It is recommended for local listing."</p> <p>The adjacent photograph is captioned "View 5 from the Belgian War Memorial towards Cumberland Park and Mitre Bridge" – but actually Mitre Bridge is essentially all but invisible in this photograph – if you look very carefully, you can just about discern the very top of it.</p> <p>Because of the distance to the bridge, and the little of it actually visible, this view contributes nothing to an individual's ability to appreciate what is special or important about it. Its presence in this view is therefore incidental.</p> <p>In terms of the bridge's meaning, purpose and detailed design, self-evidently these are best appreciated in the linear views from the canal. For example it is only in these views (or other nearby locations) that it is actually possible to discern that the abutments are constructed of purple and red engineering brick.</p> <p>Consequently, this detailed description of the bridge and its attributes should be removed from view 5 and placed in the "elements in the view" description in View 31 - North from towpath looking at Mitre Bridge and Cumberland Park area, where this description would serve a useful purpose.</p> <p>As we previously noted, view 5 and its context will of course be highly altered by the recent consent for North Kensington Gate, North and South. This is clearly material to any consideration of other changes or development which may be proposed, and reference therefore should be made to it.</p> <p>We would request that the revisions set out above are incorporated within the final drafting of the document. We would additionally welcome the opportunity to meet with officers and relevant individuals from Allies and Morrison to run through the points above and discuss the rational for the changes proposed.</p>
21.b	821	Planning Consultant	Nick	Sharpe	Montagu Evans	Boropex Holdings Ltd	Views Study	View 5	<p>View 5 from the Belgian War Memorial (Grade II) towards Cumberland Park</p> <p>"Elements in the view".</p> <p>The text states that... "Scrubs Lane overbridge can be seen in the distance to the south, a colourful single span bow string bridge, constructed of steel with purple and red engineering brick abutments. The bridge has a degree of aesthetic value and is a local landmark. It is recommended for local listing."</p> <p>The adjacent photograph is captioned "View 5 from the Belgian War Memorial towards Cumberland Park and Mitre Bridge" – but actually Mitre Bridge is essentially all but invisible in this photograph – if you look very carefully, you can just about discern the very top of it.</p> <p>Because of the distance to the bridge, and the little of it actually visible, this view contributes nothing to an individual's ability to appreciate what is special or important about it. Its presence in this view is therefore incidental.</p> <p>In terms of the bridge's meaning, purpose and detailed design, self-evidently these are best appreciated in the linear views from the canal. For example it is only in these views (or other nearby locations) that it is actually possible to discern that the abutments are constructed of purple and red engineering brick.</p> <p>Consequently, this detailed description of the bridge and its attributes should be removed from view 5 and placed in the "elements in the view" description in View 31 - North from towpath looking at Mitre Bridge and Cumberland Park area, where this description would serve a useful purpose.</p> <p>As we previously noted, view 5 and its context will of course be highly altered by the recent consent for North Kensington Gate, North and South. This is clearly material to any consideration of other changes or development which may be proposed, and reference therefore should be made to it.</p> <p>We would request that the revisions set out above are incorporated within the final drafting of the document. We would additionally welcome the opportunity to meet with officers and relevant individuals from Allies and Morrison to run through the points above and discuss the rational for the changes proposed.</p>

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119	871	Strategic Partner	Wesley	Harcourt	Wormwood Scrubs Charitable Trust		Views Study		Following the new Tall Buildings Study, a revision should be made to the Views Study Tall buildings would be on view from all parts of Wormwood Scrubs and sensitivity would be described as High. (see Fig 3.15 Sensitive Locations) This is particularly important close to the northern boundary where the observers cone of vision would benefit from a buffer zone of lower buildings as suggested in 8.1 above. Heritage views should consider the Heritage Core of the scrubs identified in the Heritage Strategy supporting document. Revise Views study to include: • Heritage views from the Scrubs including the Heritage core i.e. looking North and North West.

Waste Apportionment Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
26	102	Strategic Partner	Archie	Onslow	North London Waste Plan		Waste Apportionment Study		We have reviewed the Waste Apportionment Study including the appended note prepared to update the assumptions for the Old Oak Sidings (Powerday) site. The new figure of 1 million tonnes (mt) capacity for the plant is at least an improvement on the previous 1.6 mt capacity claimed on the basis of licenced capacity. However at 1mt it would have a larger throughput than any other waste facility in London. The 1mt capacity is predicated on around 450,000 tonnes being able to arrive at the facility by water and rail, which again would establish new records for facilities in London. The possible contribution from RDF to energy supply is welcome but I leave it to the Inspector to decide how realistic this new 1 mt figure is. The capacity figure is significant because in 3.24, the Powerday capacity is then used as justification for the OPDC not needing to safeguard the EMR waste site for apportionment purposes

Willesden Junction Station Feasibility Study

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
90	136	Local Resident	John	Cox			Willesden Junction Station Feasibility Study		Referring to my Reg 19(1) comments 1446 to 1458 on the supporting document 'Willesden Junction Station Feasibility Study', I re-emphasise my assertion that the study is unsound. That assertion is based on material considerations in determining applications, and in railway 'permitted development'. (1) the National Planning Policy Framework 2018 requirement for sustainability: "Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs." (2) the London Mayor's draft New London Plan 2018: "We now face another wave of growth, the likes of which we've not seen for a century. Our population is projected to increase by 70,000 every year, reaching 10.5 million in 2041." (3) the London Mayor's Transport Strategy 2018: "This strategy document details how we aim to change the transport mix across London, providing viable and attractive alternatives that will allow Londoners to reduce their dependence on cars. The aim is simple but ambitious, and has important implications for our streets, public places and future growth as a city."
90	137	Local Resident	John	Cox			Willesden Junction Station Feasibility Study		The predicted population increase for London, plus the necessity to intensify public transport, means that an expanded and more frequent local rail network in London is essential, whatever other modal changes take place. The Local Plan would have difficulty arguing otherwise. With high-enough population densities, a London-wide mixture of trains and trams provides an appropriate fast and reliable system, with evidence that private-sector property investment follows when the state provides such visible and permanent links in advance. Less attractive additional bus services cannot generally secure this investment, particularly since the lack of hard infrastructure means they may well be here-today, gone-tomorrow. That means more frequent trains and better interchanges between lines (ideally cross-platform) are required, to provide an expanded two-dimensional mesh of London rail links, both radial and (especially) orbital and tangential. There is a case for new radial tunnels from the edge of London to some of the Victorian railway terminals for long-distance trains, to allow more local London trains on surface tracks, but this is not generally necessary on the already widened routes of the more prosperous north London railway companies, compared to south London.

Res. Ref.	Com. Ref.	Respondent Type	First Name	Surname	Organisation	On Behalf Of	Supporting Study	Section / Para Ref	Comment
90	138	Local Resident	John	Cox			Willesden Junction Station Feasability Study		<p>To summarise: If the OPDC Local Plan chooses not to document passive provision for all reasonable upgrades at Willesden Junction station, then that is unsustainable as a policy (since corrective action by later generations over the decades ahead would be vastly more expensive) and in planning terms it is therefore unsound.</p> <p>It is untenable for the OPDC Local Plan NOT to plan for major expansion of Willesden Junction station, with passive provision for the upgrades I have already suggested.</p> <p>This long-list of upgrades "at this formative stage" does not need expert, railway professionals to produce it. The general public are stakeholders just as much as 'the usual suspects' of the transport industry - and that realisation would be a revolutionary change for Network Rail and Transport for London.</p> <p>Only more detailed analysis needs transport professionals, but even then, a current unviable project from the long-list may not remain unviable forever</p>
90	139	Local Resident	John	Cox			Willesden Junction Station Feasability Study		<p>Low-level station: There must be no intervention that destroys the existing four platform arrangement. The recent low-grade building on one of the bay platforms can be removed. Both bays can be extended to become through tracks, a possibility surely envisaged when that part of the station was designed in 1912.</p>
90	140	Local Resident	John	Cox			Willesden Junction Station Feasability Study		<p>High-level station: Transport for London (TfL) no longer considers a West London Line station at Hythe Road meets transport needs, however desirable otherwise it would be as a centrepiece of the Old Oak North development. Since TfL will not provide funds for Hythe Road, it may be deferred, perhaps until the Crossrail depot land in Old Oak South becomes available, beyond the period of the Local Plan. There will never be a need for three tracks at Hythe Road, but Willesden Junction becomes more important. Extra tracks across the West Coast Main Line (WCML) to Willesden Junction high-level station would be expensive, but the OPDC cannot assume neo-liberalism and austerity will last forever, or even for the twenty years of the Local Plan. For economy, it is possible that four high-level platforms could co-exist with only one extra WCML bridge, instead of two. The central bridge of the three would be used bi-directionally. The two central platforms of the four could be used for terminating trains, rather like Edgware Road (Metropolitan and Circle Lines) station. There would be no third platform at Hythe Road station, ever. Alternatively, with no terminating trains, the bi-directional central bridge would be shared between the up-West-London-Line ("up" is defined as towards Stratford) and the down-North London Line, and lead to the two central high-level platforms, one up and one down. The island platforms would have both up lines at one of them, and both down lines at the other. Terminating trains from Stratford or Barking would ideally continue to an extra platform at Old Oak Common station, so terminating trains from Clapham Junction (or beyond) are more likely at Willesden Junction.</p>
90	141	Local Resident	John	Cox			Willesden Junction Station Feasability Study		<p>Main-line station: Space for four platforms for the WCML slow lines are needed, but for economy, four platforms for the fast lines could perhaps be shared during normal operation with the two for the Southern Milton Keynes-Croydon trains via the West London Line chord. Nevertheless a booming Old Oak Common development would still justify provision for all WCML trains stopping at Willesden Junction station, for passengers able to avoid Euston.</p>