

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

Michael Mulhern
OPDC
City Hall
The Queen's Walk
LONDON
SE1 2AA

Our ref: LDF40/LDD01/DR01
Date: 27 July 2018

Dear Mr Mulhern,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Old Oak Park Royal Development Corporation Local Plan - Second Regulation 19 Consultation

Thank you for consulting the Mayor of London on the Old Oak Park Royal Development Corporation Local Plan Second Regulation 19 consultation. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. These representations include comments from Transport for London (TfL), which the Mayor supports and are included in this letter. Detailed comments from TfL which should also be read as part of this response are attached as an Annex.

On 22 March 2016, the Mayor provided comments on the Regulation 18 stage of the Old Oak Park Royal Development Corporation Local Plan. This was followed by further correspondence dated 05 April 2016 regarding the role of the draft Plan in addressing wider strategic housing need. On 11 September 2017 the Mayor provided comments on the Regulation 19 stage of the draft Plan. Unless specifically addressed in this response, the Mayor has not withdrawn his comments of 11 September 2017.

The London Plan

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.

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.

Housing

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.

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. 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.

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.

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.

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.

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.

Strategic Industrial Land

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.

The Mayor welcomes the revisions to Policy P4 clarifying the status of Park Royal as a leading location for industrial businesses.

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.

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.

Visitor accommodation

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.

Transport

TfL is pleased that references to the Elizabeth line depot site being delivered as part of the current Local Plan have been removed as previously requested. They 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.

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.

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.

Positive references throughout the Plan to Good Growth and Healthy Streets alongside additional text supporting Mayoral priorities including targets for mode shift are welcomed.

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.

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.

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.

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.

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.

Further detailed comments from TfL can be found in the Annex.

Waste

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.

Next stages

I hope that these comments can inform the Examination of the OPDC Local Plan. If you would like to discuss any of my representations in more detail, please contact Darren Richards (020 7983 4287) who will be happy to discuss any of the issues raised.

Yours sincerely,

Julietta McLoughlin

Assistant Director - Planning

Cc Tony Devenish, Dr Onkar Sahota and Navin Shah, London Assembly Constituency Members
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Appendix 1 - Further detailed comments from Transport for London

Old Oak and Park Royal draft Local Plan Revised Reg. 19 consultation TfL comments

Chapter 1 – Introduction

Section	Paragraph	Comment
	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.

Chapter 2 – Strategic Vision

Section	Paragraph	Comment
	Figure 2.1	<p>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.</p> <p>The additional mention of the Mayor’s mode shift targets and traffic reduction strategies is welcomed.</p> <p>Health and Wellbeing – TfL welcomes the added reference to the Healthy Streets approach.</p> <p>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.</p>
	Figure 2.2 (also LO stations in Figures 3.7, 3.15, 6.6 and 10.3)	<p>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</p> <p>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)</p>

Chapter 3 – Strategic Policies

Section	Paragraph	Comment
SP1	Paragraph 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.
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.
SP3	Paragraph 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.
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.
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.
SP7	Policy part b (iv)	TfL is pleased that part b (iv) has been strengthened and clarified for consistency with policy T4.
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
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.
SP7	Policy part b (iii) and	Reference to ‘potential’ new London Overground stations in paragraph 4.2 is welcomed.

	Paragraph 4.2	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'
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.

Chapter 4 – Places

Section	Paragraph	Comment
P1	Policy, Paragraphs OOS3 and OOS4	<p>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.</p> <p>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.</p>
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.
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

		<p>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:</p> <p>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.</p>
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.
P2	Policy part d and OON 7	<p>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.</p> <p>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</p>

		achieved nothing should be done to preclude the delivery of the currently approved design
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
P2	OON 7	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.
P2	OON 13	TfL is pleased to note that Park Road will not be designed as a through route for private vehicles.
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.
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.
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."
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.

P7C2	Vision, Figure 4.25, Policy part c and d	<p>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.</p> <p>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</p>
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.
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
P8	Policy part c (i) and Figure 4.27	<p>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</p> <p>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</p>
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.
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.
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.
P11	Policy part j, Figure 4.44, WJ 8 – 12, WJ 15 - 16	<p>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.</p> <p>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.</p>
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

Chapter 5 – Design

Section	Paragraph	Comment
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

Chapter 7 – Transport

Section	Paragraph	Comment
	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
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.
T1	Policy part e	TfL suggests that this should read ‘minimise and mitigate the impact...’
T1	7.7	TfL welcomes references to the Healthy Streets Check for Designers tool and the TfL Streets Toolkit
T2	Figure 7.5	TfL welcomes changes and additions to the map in response to previous comments
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
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
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’
T3	Figure 7.7	TfL welcomes changes and additions to the map in response to previous comments
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. TfL welcomes the reference to requirements for submission of Parking Design and Management Plans as set out in the draft new London Plan
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. 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.
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
T4	7.35	TfL welcomes the additional text that confirms how coach, taxi and PHV facilities will be provided
T5	7.37	TfL welcomes the addition of the word ‘potential’ when referring to London Overground stations to better reflect their current status
T5	7.38	TfL welcomes the amended wording which allows flexibility in how the public realm around the station will be designed
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
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
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
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
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Chapter 11 – Delivery and Implementation

Section	Paragraph	Comment
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.

TfL looks forward to continuing involvement in the next stages of the Local Plan process.