

OPDC Local Plan

Table of Consultation Comments and OPDC Officer Responses

September 2021

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
1	Local Resident	Adebayo	S		1		Places		P10		1. It is good to see less industry and more residential being planned for the scrubs lane area. I just hope whoever wins the tenders to construct the new residential does the best quality job possible. I've seen some of the development that has gone up in the South Kilburn redevelopment scheme, and after only a few years, some of the buildings are developing problems such as damp and cracking brickwork, which is very sad.	Noted. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
1	Local Resident	Adebayo	S		2		Transport		T7		2. As somebody who lives on Wrotesley Road NW10 which is constantly inundated with incredibly loud heavy speeding skip trucks. Can anything be done to reduce this type of industrial traffic. The Edwardian/Victorian really suffer when the loaded skip trucks speed over the speed bumps, on their way to deposit their waste at the various recycling centres such as Powerday in and around the scrubs lane area	No change proposed. This was not a part of the Local Plan that was amended and consulted on as part of the Main Modifications consultation. However, OPDC has policies within the Local Plan to reduce construction trips and ensure impacts are appropriately mitigated.	N	
1	Local Resident	Adebayo	S		3		Transport		T1		3. Many drivers particularly those with those powerful Motorbikes speed up Wrotesley Road NW10 using it as a race track. It would be helpful to introduce more traffic calming measures and stricter enforcement of speed limits.	No change proposed. Wrotesley Road is located outside the OPDC Local Plan boundary and OPDC is therefore not planning for transport improvements along this road.	N	
1	Local Resident	Adebayo	S		4		Places		P10		4. Encourage the greening up the Harrow Road around the wrotesley road area. It's 2021, and it still looks very downtrodden around that area. Rubbish and Fly Tipping everywhere. I know it lies on the boundary between Brent and Hammersmith and Fulham Councils. But if the 2 councils worked together you could really beautify that area. At the moment its a neglected part of NW10. I'd rather walk further to Salisbury Road, Queens Park, which has just as much traffic. But it's so much nicer for grocery shopping.	No change proposed. Policy P10 supports street greening along the length of Scrubs Lane. Wrotesley Road is outside of OPDC's boundary. OPDC's remit is limited to its role as a local planning authority. Parking Enforcement and waste collection remain the responsibility of the relevant local authority.	N	
1	Local Resident	Adebayo	S		5		Transport				5. Please do more to encourage the use of electric vans and buses, scooters etc. The air quality around the Wrotesley Road, Scrubs Lane, Harrow Road part of NW10 is dreadful. So many diesel vehicles emitting dangerous amounts of NO2.	No change proposed. The Local Plan polices T4 set out our requirements for development to introduce electric vehicle charging infrastructure in line with the 2021 London Plan standards. The Local Plan is also supported by a Bus Strategy for improving and extending new bus routes and providing for new bus connections to support growth. In addition, the Ultra Low Emission Zone is due to expand across the OPDC area in October 2021 requiring tighter emission standards from vehicles, which will contribute to an improvement in air quality in the short term.	N	

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2	Local Resident	Alessia	Stevani		1		Spatial Vision				<p>I am writing to object in the strongest possible way to the OPDC's 2021 Draft Local Plan, which promotes the unnecessary overdevelopment of our area especially around Channel Gate.</p> <p>Overdevelopment continues to be sold as 'regeneration' when, in reality, it suffocates its surroundings and creates division among the existing communities through the creation of a multitude of additional dwellings over a lack of facilities and infrastructure. Apart from the tangible financial benefits for property developers and their supporters, who usually tend to live miles away, there are no tangible benefits to the quality of life of local residents.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that benefits new and existing communities.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>OPDC's Social Infrastructure Needs Study Update identifies improvements needed to existing community facilities and what new facilities are needed to support new and existing communities.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
2	Local Resident	Alessia	Stevani		2		Places		P7		<p>I am attaching photographs of the dystopian nightmare that is North Acton with its ridiculously tall and cheap looking skyscrapers taking up the space of what should have been repurposed with a village feel in mind.</p>	<p>No change proposed.</p> <p>OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The proposed modifications for P7 and P7C1 relating to North Acton are limited and continue to seek high quality high density development. Other policies throughout the Local Plan require buildings and the public realm to be well-designed and these policies would be applied alongside design policies in the 2021 London Plan.</p> <p>Policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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2	Local Resident	Alessia	Stevani		3		Places		P8		I am also attaching photographs of nearby Old Oak Common, which shockingly both the OPDC and local authorities are keen to repeat.	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners. A temporary planning application for an alternative construction access road for HS2 (ref 21/0001/FULOPDC) was granted planning permission by OPDC planning committee on 23 February for a period of 18 months. This requires mitigation measures to be implemented as set out in the Ecological Appraisal and Arboricultural Report.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	
2	Local Resident	Alessia	Stevani		4		Places				It is often said that Ealing is the Queen of the Suburbs. Not anymore. As a result of poor planning judgment, lack of education, and greed especially on the part of some developers, parts of Ealing have become seriously shabby and neglected.	<p>Noted. OPDC's Local Plan contains a series of planning policies requiring the highest quality of architecture and design of both buildings and the public realm and that there are appropriate management and maintenance plans in place to ensure that developments are continually maintained to ensure that this design quality endures.</p>	N	
2	Local Resident	Alessia	Stevani		5		Housing		H3		To correct this, why not build more cottages and modest family homes instead of ugly, soulless towers which are either too expensive to afford or too cheaply constructed to want to invest in long term?	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL, including Channel Gate and Scrubs Lane. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. This will include delivering a range of housing types including some houses and maisonettes.</p> <p>The modifications have been proposed in response to the Planning Inspector's Interim Findings and to ensure general conformity with the 2021 London Plan in respect of OPDC's housing targets. However, within Policy H3 25% of all new homes should be family-sized units and in particular, provide social/affordable rent homes in a mix of sizes in accordance with the most up-to date Strategic Housing Market Assessment. The Local Plan also has policies to ensure design of housing appropriate for families, with secure doorstep and communal play space.</p>	N	
2	Local Resident	Alessia	Stevani		6		Places		P9		<p>The cottages which were destroyed on Channel Gate Road should be rebuilt and reconnected either side and the nearby Willesden freight depot, with access from Atlas Road, should continue to be rented out to selected businesses to ensure the post-Brexit economy stays afloat.</p> <p>I would like to add that by 'cottages' I don't mean the awful four-flat precedent that the OPDC has waved through with much gusto in our East Acton Conservation area despite evidence of its negative connotations (more pictures attached) - something none of your officers would put up living next to for five minutes.</p>	<p>No change proposed.</p> <p>Development identified in the Local Plan has the capacity to generate 36,350 new jobs in the area, while policies are in place to support existing businesses, and to provide affordable workspace for small businesses and new start ups.</p> <p>The Local Plan recognises the value of the railway cottages and their designations within the Old Oak Lane conservation area, and policies require that development proposals conserve and enhance them and other heritage assets.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. This will include delivering a range of housing types including some houses and maisonettes.</p> <p>The East Acton Conservation Area is not within OPDC's boundary.</p>	N	

2	Local Resident	Alessia	Stevani		7		General	Consultation			<p>No decisions should be made by the OPDC, local authorities or developers until residents have been properly consulted and listened to in a series of meetings to be attended in person over the coming future. Any other process may be regarded with suspicion.</p>	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held, delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform that held all materials, including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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3	Local Resident	Alexandra	McKenzie		1		Places		P10		<p>I am responding to consultation on OPDC Modified Draft Local Plan. I am very concerned about the low quality of the proposals for the site and as such about the OPDC Modified Draft Local Plan.</p> <p>And such I registered my concern at the previous stages of the consultations. It is a "white elephant" project that will never be satisfactory in future because of its poor quality of urban design and continuously reduced amenities that would provide a poor quality environment in terms of design, transport and new road accessibility. This development makes no contribution to the adjacent neighbourhoods!!!.It reminds me of some urban overdevelopment plans from China.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continues to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area, benefiting new and existing communities. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met and that these communities are well connected. These connections are set out in our Infrastructure Delivery Plan. These proposals include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. These deliver a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11.</p> <p>OPDC's Social Infrastructure Needs Study Update identifies improvements needed to existing community facilities and what new facilities are needed to support new and existing communities.</p>	N	

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3	Local Resident	Alexandra	McKenzie		2		Places		P10		<p>In particular I am concerned by unsuitable and increasing number of tall high rise buildings that were not part of previous OPDC Draft Local Plan of 2018.</p> <p>The parks skyline and its open space (Woodworm Scrubs and Little Woodworm scrubs) is already negatively affected by the development of the Imperial College from the south and east directions with unsightly cranes dominating the top of the buildings combined with its unattractive garish cladding envelope.</p> <p>The new group of high rise buildings with have a visually negative effect from the remaining visually clear sides of the parks.</p>	<p>No change proposed.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations, including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This, therefore, enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is supported by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate, subject to ensuring development is of a high quality. The Local Plan and 2021 London Plan provide policies to ensure this is secured through the development management process.</p> <p>Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	
3	Local Resident	Alexandra	McKenzie		3		General	Delay or withdraw the plan			<p>The plan should be withdrawn and re-assessed when the final effect of the Brexit and pandemic is to be apparent.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect on the impacts of Brexit and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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3	Local Resident	Alexandra	McKenzie		4		Strategic Policies		SP8		During the Covid-19 lockdowns these parks were intensively used and became increasingly popular because they provided the rare open green space and relaxation from urban and domestic enclosed environment.	Noted.	N	
4	Local Resident	Amanda	Souter_1		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any requirements to support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	

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4	Local Resident	Amanda	Souter_1		2		Design		D3, D4		We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
4	Local Resident	Amanda	Souter_1		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid-19. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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4	Local Resident	Amanda	Souter_1		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
4	Local Resident	Amanda	Souter_1		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
4	Local Resident	Amanda	Souter_1		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
4	Local Resident	Amanda	Souter_1		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can then continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects with the eastern entrance of Old Oak Common station via the Grand Union Canal, and the second that connects Old Oak Common station via Union Way and Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	

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4	Local Resident	Amanda	Souter_1		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. This was not a part of the Local Plan that was amended. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	
4	Local Resident	Amanda	Souter_1		9		Strategic Policies		SP9		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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4	Local Resident	Amanda	Souter_1		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>The recorded number of long-term empty (6 months or more) homes in London is at an historic low level according to official figures. However, it takes time for new developments to become fully occupied and housing developers and Registered Providers have operational plans to manage this process. For example, there may be legal restrictions within s106 agreements whereby the affordable units can only be fully occupied when a majority of the private units have been occupied or there may be access practicalities meaning that certain blocks are left empty for a short time. There may also be delays in handing over units for occupation. This has been particularly apparent in the past year because of the Covid-19 restrictions.</p>	N	
4	Local Resident	Amanda	Souter_1		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	

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4	Local Resident	Amanda	Souter_1		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the Submission Local Plan. This is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	
4	Local Resident	Amanda	Souter_1		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for the local community. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
4	Local Resident	Amanda	Souter_1		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	

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4	Local Resident	Amanda	Souter_1		15		General	Support for community group comments			I would like to say that I also support all the objections submitted by OONF, TITRA and local Old Oak/Park Royal community groups.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments, TITRA's comments and other community groups' comments.	N	
4	Local Resident	Amanda	Souter_2		16		Design		D5		<p>Following on from my previous email, these are further objections to the new OPDC local plan:</p> <ul style="list-style-type: none"> • Open skylines of the Scrubs are being destroyed by impact of tall buildings in all directions 	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The principle for delivering clusters and coordinating the location of tall buildings in clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is supported by an updated Scrubs Lane Strategic Views Assessment that assessed the proposed modifications to policy P10 buildings heights guidance in relation to the impact on heritage assets and townscape. The updated outcome of the assessment has not changed.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

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4	Local Resident	Amanda	Souter_2		17		Environment and Utilities		EU2		<p>Following on from my previous email, these are further objections to the new OPDC local plan:</p> <ul style="list-style-type: none"> This was a part of London which until recent years had open views and green space that felt on the edge of the city – a rare feature that should have been maintained for all Londoners to the benefit of mental health and clean air. 	<p>No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
4	Local Resident	Amanda	Souter_2		18		General	Extent of changes			<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> Consultation by OPDC on the 'modifications' has been inadequate. Proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan. This is a significant revision to plans for the area, and more than a last minute 'modification'. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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4	Local Resident	Amanda	Souter_2		19		General	Delay or withdraw the plan			<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> Local people do not understand why plans should be fixed now, when the HS2/Elizabeth Line station will not open for a decade. Why not wait to see the impact of the pandemic on London's housing needs and travel patterns, and start again on a better Local Plan? 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect on the impacts of Brexit and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
4	Local Resident	Amanda	Souter_2		20		Transport				<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> Old Oak Common station will have no vehicle access at its eastern end, from Scrubs Lane/Wood Lane. We do not see why this station will be more than a rail interchange where passengers cross platforms between HS2, GWR and the Elizabeth Line to reach their destination? Why will the new station be a 'catalyst' that will 'transform' this part of London? Having no eastern access is a DEger. If there was a fire or a terrorise attack there is only one way in and one way out. This would further isolate Wells house Road residents and put them in DEger. 	<p>No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in it's own right, similar to Kings Cross. OPDC's aspirations for Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area. The station has been designed with the western entrance being the main station entrance, meeting all health and safety, including fire, regulations.</p>	N	
4	Local Resident	Amanda	Souter_2		21		Spatial Vision				<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> The original 2015 'vision' for Old Oak has been largely lost on the way. This 'modified' Plan is not what is needed for the future of this part of London. 	<p>No change proposed. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p>	N	
4	Local Resident	Amanda	Souter_2		22		Transport		T8		<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> How the local area infrastructure will cater to this is anyone's guess – it's struggling now. Add in the uptick in human traffic and construction traffic(HS2 Are adding 700 lorries a day from October just for the Old Oak site) and post-completion servicing lorries.... 	<p>No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth.</p>	N	
4	Local Resident	Amanda	Souter_2		23		Environment and Utilities		EU2		<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> Amenity space is seriously lacking and the draft plan shows vague reference to two areas only of "local park search" in the whole of the plan 	<p>No change proposed.</p> <p>The Local Plan requires proposals to ensure that 30% of developable land outside of SIL is delivered as publicly accessible open space. This includes the delivery of two new Local Parks, of a minimum 2 ha in size.</p> <p>Areas of search of have been identified for the Local Parks as their specific boundaries and exact locations within Channel Gate and Old Oak South are to be confirmed as development proposals progress.</p>	N	

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4	Local Resident	Amanda	Souter_2		24		Design		D5		<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> • There is an element of randomness in all the tall buildings proposed with varying heights and materials - which not only destroy the skyline but create chaos visually 	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The principle for delivering clusters and coordinating the location of tall buildings in clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is supported by an updated Scrubs Lane Strategic Views Assessment that assessed the proposed modifications to policy P10 buildings heights guidance in relation to the impact on heritage assets and townscape. The updated outcome of the assessment has not changed.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
4	Local Resident	Amanda	Souter_2		25		Places		P10		<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> • With the loss of the car giant site and two overground stations and the addition of two new and distinct building clusters the idea that the plan has only been subject to minor changes simply doesn't pass muster; 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p>	N	

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4	Local Resident	Amanda	Souter_2		26		Places		P2		<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> The removal of the car giant site which was to be primarily residential without any corresponding reduction in the number of homes proposed is logically unsound; 	<p>No change proposed. The proposed modifications to the Old Oak North Policy P2 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. This includes information demonstrating how the Local Plan will continue to meet 2021 London Plan housing targets. This was carried out by identifying updated capacity and phasing information on sites already identified for mixed use development and releasing other sites for mixed use development that were previously identified for industrial uses. This includes the release of the Channel Gate site that was previously identified as a Strategic Industrial Location and has a similar developable area to Old Oak North. Delivering homes on this site and other sites means the Local Plan is able to continue to deliver homes and a reduction in the number of homes is not required.</p> <p>Statements of Common Ground have been signed with each of the landowners of sites proposed to be modified demonstrating deliverability.</p>	N	
4	Local Resident	Amanda	Souter_2		27		General	Delay or withdraw the plan			<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> The plan takes no account of recent developments- pandemic related changes to work and travel patterns and increasing focus on climate change in particular - and going back to the drawing board as opposed to pushing through a plan that is not fit for purpose and unsound would be the right way to go; 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect on the impacts of Brexit and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

4	Local Resident	Amanda	Souter_2	28	General	Consultation	<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> The OPDC has failed to communicate effectively with stakeholders and indeed has barely communicated at all. There is no meaningful engagement with residents and the current board under Liz peace excludes any representation from the local community. 	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. Publishing a Consultation Plan setting out the consultation process to ensure transparency. Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. Writing to 44,000 properties in and around the OPDC area. Putting up posters at key locations across the OPDC area. Issuing e-newsletters to all of OPDC's subscribers. Providing briefings to key community and business groups. Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. An open offer for officers to attend community events and hold one-to-one meetings with community members. A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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4	Local Resident	Amanda	Souter_2		29		General	Delay or withdraw the plan			<p>Following on from my previous email, these are further objections to the new Opdc local plan:</p> <ul style="list-style-type: none"> Given the ever extending timeline for the opening of the HS2 station - 2029-33 - there is more than enough time available to do this properly. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

5	Local Resident	Amelia Fernandez	1	General Consultation	<p>Please can I register a strong objection to the recent unflagged changes to the opdc local plan. Once again it feels like large development is being approved without proper consultation of local residents.</p>	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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5	Local Resident	Amelia	Fernandez		2		General	Support for community group comments			The current times in particular involve a lot of uncertainty for residents and further emphasises the need to have a good place to live with the community being happy. To this end I support the old oak community forum and their representations. Please consider our opinions before making any changes to a plan that will directly affect this community.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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6	Local Resident	Andre	Michaud		1		General	Support for community group comments			I fully support all representations that have been raised and documented by the STQW forum.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments	N	

7	Politician	Andy	Slaughter MP	1	Places	P10	<p>1. The scale of the modifications mean the proposed Local Plan differs greatly from the 2018 submission. In particular, the decision not to pursue comprehensive redevelopment on the Car Giant site (Old Oak North) and the consequent switch of the largest residential development area from here to Channel Gate has the following consequences:</p> <p>1.1 The bulk of residential development will now be in the London Borough of Ealing (LBE) and outside my constituency. This begs the question as to what the development strategy will now be for London Borough of Hammersmith & Fulham (LBHF). There appears to have been some attempt to focus more on ribbon development along Scrubs Lane and a new/enhanced zone named North Pole East. This mainly consists of single tall buildings or small clusters which are unrelated to their surroundings and isolated from the rest of the OPDC area. There is an argument given this separation and new prospect for OPDC to concentrate its efforts on LBE and devolve planning authority to LBHF (as has been the case with LBE to date) to allow approvals to be decided in a way which most accommodates the situation locally in LBHF. The North Pole/Scrubs Lane developments are likely to have more association with the White City Opportunity Area to the south than the rest of OPDC, not least given the transport links discussed below.</p>	<p>No change proposed. OPDC considers that the proposed modifications to the Local Plan deliver a sound and appropriate spatial strategy for the OPDC area that is fully justified through new and updated supporting studies. This includes the locations within the London Borough of Hammersmith and Fulham (LBHF) that include the mixed use areas of Scrubs Lane and Willesden Junction, the Strategic Industrial Location of Old Oak North, the mixed use commercial centre in Old Oak South and Wormwood Scrubs. Although the number of homes being delivered in LBHF are proposed to be reduced in response to the Inspector's Interim Findings, the modifications proposed an increase in jobs and employment floorspace within the borough.</p> <p>OPDC does not have a scheme of delegation with LBHF and continues to be the planning authority for the OPDC areas within LBHF.</p> <p>The proposed modifications to Old Oak North in Policy P2 set out exciting plans for the industrial intensification of the Strategic Industrial Location here, which has the potential to deliver thousands of new jobs. Proposed modifications to Policy P2 regarding Old Oak North also support the delivery of ancillary services and facilities to support place-making and activate key routes to support connectivity.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes.</p> <p>Scrubs Lane itself will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. This will enable access to Harlesden in the north, Kensal Canalside in the east, White City in the South and Old Oak in the west. Improvements in the Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>In relation to the North Pole East Depot site, DfT have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p> <p>The principle for delivering high quality high density mixed use development in areas outside of SIL continues to be a critical part of the Local Plan and has not been modified as part of the proposed main modifications. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policies SP2 and SP3 provide guidance to deliver Good Growth, improve health and reduce health inequalities. Policies SP2 and SP9 are not proposed to be modified; SP3 is subject to minor proposed modifications.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles (SLDFP). This approach to tall buildings is embedded within a comprehensive approach for building heights in the SLDFP that ensure development responds to the surrounding context including lower heights adjacent to sensitive locations.</p>	N
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												<p>The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p>		

7	Politician	Andy	Slaughter MP	2	Design	D5	<p>1. The scale of the modifications mean the proposed Local Plan differs greatly from the 2018 submission. In particular, the decision not to pursue comprehensive redevelopment on the Car Giant site (Old Oak North) and the consequent switch of the largest residential development area from here to Channel Gate has the following consequences:</p> <p>1.1 Old Oak North was to provide a substantial proportion (around a third) of the new residential units for OPDC before the masterplan for that area was abandoned. Replacement proposals are at an early stage, but they appear to be characterised by tall or very tall buildings allocated wherever land is available. This is a reaction to the sudden loss of a major part of OPDC for comprehensive redevelopment, but it is not a sound basis for planning new districts of London, in my opinion. We badly need new housing, especially genuinely affordable housing, in this part of London so the 25,000 plus figure for new residential units, which has been tagged to OPDC since its inception under the previous Mayor, is superficially attractive. However, we want these new homes to be well-designed, sustainable and providing not just decent living conditions but integration into existing communities. A series of tall buildings is not best way to achieve this, especially if their height and location is determined by what parcels of land are left available after all other options are ruled out. Tall buildings are generally out of favour with the public (though not with developers). In the case of residential this is largely an effect of the cladding crisis; in the case of commercial buildings the long-term effect of Covid-19 in expanding homeworking has yet to be resolved. I am not opposed to high-density housing where this can be achieved sympathetically (and there are examples already in LBHF) but clusters of very tall buildings in previously low-rise areas outside the city centre (as we are seeing at North Acton) please no one except those who profit from them.</p>	<p>No change proposed.</p> <p>OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. We consider that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that benefits new and existing communities.</p> <p>The nexus of density, heights and housing targets was discussed at the Examination Hearings in April 2019. The outcome of this was that the Inspector was in general agreement with the approach undertaken by OPDC but requested that OPDC make a minor modification to repeat the proposed density range within the Development Capacity Study within the main body of the Local Plan.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policies SP2 and SP3 provide guidance to deliver Good Growth, improve health and reduce health inequalities. Policies SP2 and SP9 are not proposed to be modified; SP3 is subject to minor proposed modifications.</p> <p>Since the hearings in 2019, in March 2020, prior to the adoption of the 2021 London Plan, the Secretary of State for Housing, Communities and Local Government (MHCLG) wrote to the Mayor of London directing him to make modifications to the London Plan. The Secretary of State of MHCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land. More recently, the Secretary of State for MHCLG's Ministerial Statement (16 December 2020) regarding housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs. These Government statements point to an increased need for housing since OPDC submitted its Local Plan. As part of this December 2020 statement, the Government published a revised housing need methodology which will mean that the next London Plan will need to accommodate more housing within London, placing an even greater emphasis on the role of Opportunity Areas as London's main reservoir of brownfield land in meeting these housing needs.</p> <p>The proposed modifications propose a range of building heights including tall buildings. OPDC considers the approach to building heights and tall buildings is plan-led, justified and considers it to be in general conformity with the 2021 London Plan. The methodology to defining locations for tall buildings in the Tall Buildings Statement Update was not subject to proposed modifications beyond the updates to the London Plan. The continued approach has been applied to the sites proposed to be modified in response to the Inspector's Interim Findings and is informed by new and updated supporting studies. The Mayor has confirmed the Local Plan is in general conformity with the 2021 London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety</p>	N
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												<p>Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met and that these communities are well connected. These connections are set out in our Infrastructure Delivery Plan. These proposals include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. These deliver a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11.</p>		

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7	Politician	Andy	Slaughter MP		3		Environment and Utilities				<p>1. The scale of the modifications mean the proposed Local Plan differs greatly from the 2018 submission. In particular, the decision not to pursue comprehensive redevelopment on the Car Giant site (Old Oak North) and the consequent switch of the largest residential development area from here to Channel Gate has the following consequences:</p> <p>1.1 Other problems with the current proposals include environmental, safety, transport and cost considerations. There are sensitive existing users and sites to be considered in LBHF. I am concerned with the effect on local amenities and historic sites, including St Mary's Cemetery, the Grand Union Canal and Wormwood Scrubs. Just as the effect on Car Giant and the many SMEs in the Hythe Road area was previously underestimated, so now the interests of businesses at Mitre Bridge and important community facilities like City Mission at 2 Scrubs Lane are potentially at risk.</p>	<p>No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The principle for delivering clusters and coordinating the location of tall buildings in clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles has been updated to provide further contextual information relating to existing social infrastructure and open spaces. This demonstrates existing education, health and open spaces are within a 15 minute walk from Mary Seacole Gardens. The Social Infrastructure Needs Study Update, in addition to delivering new facilities, also identifies the need to make use of and support existing education and health facilities. This will be facilitated through planning obligations secured through the development management process. Borough education officers and Clinical Commissioning Group officers were involved in the production of the Social Infrastructure Needs Study Update.</p> <p>The Local Plan is also supported by a Bus Strategy for improving and extending new bus routes and providing for new bus connections to support development along Scrubs Lane. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p> <p>The Scrubs Lane Development Framework Principles is supported by an updated Scrubs Lane Strategic Views Assessment that assessed the proposed modifications to policy P10 buildings heights guidance in relation to the impact on heritage assets and townscape. The updated outcome of the assessment has not changed.</p> <p>The Mitre Industrial Estate was identified for mixed use development in the submission Local Plan. This is not proposed to be modified. Policy E2 provides guidance for reproviding existing industrial floorspace.</p> <p>Paragraph 4.171 supporting policy P10 recognises the City Mission Church as important centres for the community and that the associated nursery was designated as an Asset of Community Value. Paragraph 4.118 confirms that the floorspace of these uses should be reprovided as required by policy TCC3.</p> <p>Policy TCC3 sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p>	N	

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7	Politician	Andy	Slaughter MP		4		Housing				<p>1. The scale of the modifications mean the proposed Local Plan differs greatly from the 2018 submission. In particular, the decision not to pursue comprehensive redevelopment on the Car Giant site (Old Oak North) and the consequent switch of the largest residential development area from here to Channel Gate has the following consequences:</p> <p>1.1 This area is very close to Grenfell Tower and it is perhaps unsurprising that issues of building safety are raised whenever new tall buildings are proposed. The design and consents I have seen so far while addressing some concerns (eg providing sprinkler systems), do not reassure. Most, for commercial reasons, have a single means of escape and guarantees about building materials cite current standards rather than aspiring to better use of methods and materials that may well become law in the next year or two.</p>	<p>No change proposed. The modifications have been proposed primarily in response to the Planning Inspector's Interim Findings for Cargiant, Old Oak North and to ensure general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	n	

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7	Politician	Andy	Slaughter MP		5		Transport		T5		<p>1. The scale of the modifications mean the proposed Local Plan differs greatly from the 2018 submission. In particular, the decision not to pursue comprehensive redevelopment on the Car Giant site (Old Oak North) and the consequent switch of the largest residential development area from here to Channel Gate has the following consequences:</p> <p>1.1 The previous proposals saw a motor access from Scrubs Lane to Old Oak Station, new Overground stations at Old Oak Common Lane and Hythe Road and generally a much more porous attitude to passengers entering and leaving the area. All of that is gone or doubtful now. The main Old Oak Station is no more than an interchange with a limited access in and out at Old Oak Common Lane. There is no motor access from the east (ie most of London) and even the distance to Channel Gate means it is unlikely that many passengers will be tempted beyond the concourse.</p>	<p>No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in it's own right, similar to Kings Cross. OPDC's aspirations for Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area. The station has been designed with the western entrance being the main station entrance, meeting all health and safety, including fire, regulations.</p>	N	

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7	Politician	Andy	Slaughter MP		6		Delivery and Implementation				<p>1. The scale of the modifications mean the proposed Local Plan differs greatly from the 2018 submission. In particular, the decision not to pursue comprehensive redevelopment on the Car Giant site (Old Oak North) and the consequent switch of the largest residential development area from here to Channel Gate has the following consequences:</p> <p>1.1 I have yet to be persuaded how the sums for OPDC add up. A gap of £350 million is mentioned but I fear it may be worse than that. To provide useful development of this area we require: land acquisition at reasonable or in some cases (eg Network Rail and other public land) nil cost; grant for preparing for development and infrastructure (the rescinded HIF money would have gone some way towards this); and housing subsidy to allow the construction of homes that meet housing need. LBHF is already struggling with this last point in its two other Opportunity Areas, White City and Earl's Court/West Ken. Even bigger questions - and sums - arise in Old Oak.</p>	<p>No change proposed.</p> <p>The Infrastructure Delivery Plan (IDP) identifies a total unfunded infrastructure cost of just under £350 million, which OPDC will need to fund through planning contributions or other funding sources. This figure has been derived from detailed assessments of infrastructure costs. When estimated planning contributions are taken into account, OPDC estimates that this results in an overall funding gap of between £136 million and £202 million.</p> <p>It is common for a Local Plan to have a funding gap, and it is even more common for there to be a funding gap for a regeneration project as large and complex as Old Oak and Park Royal. OPDC's IDP sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p> <p>The IDP sets out a range of potential public funding sources which could be utilised to help address the funding gap, including the National Home Building Fund. OPDC is not relying solely on the NHBF to address the funding gap, however, there is clear government support for potentially using the NHBF to support infrastructure delivery in the OPDC area. Robert Jendrick's ministerial statement on housing needs in December 2020 stated "In order to support London to deliver the right homes in the right places, the government and Homes England are working with the Greater London Authority to boost delivery through the Home Building Fund. Homes England has been providing expertise and experience to support the development of key sites in London. Sites like Old Oak Common, Nine Elms and Inner East London provide opportunities to deliver homes on significant brownfield sites." The letter provided from Homes England appended to the IDP demonstrates the support that there is for the regeneration project and recognises the need for public investment. It is noted that Homes England would welcome a bid from OPDC.</p> <p>Matters such as the price at which land will likely be acquired and the impact of housing grant has been modelled within OPDC's Strategic Sites Viability Assessment, which shows that the key sites that have been modelled within the Local Plan can be viably developed during the Local Plan period.</p>	N	

7	Politician	Andy	Slaughter MP	7	General	Consultation	<p>3. I do not think I am alone in raising some of these concerns, nor are they new. I have seen the submissions from, LBHF, Friends of Wormwood Scrubs and Old Oak Neighbourhood Forum and agree with many point made there. I am concerned that there is not more engagement with these well-informed sources on a regular basis. There is a democratic deficit in the way OPDC operates, with limited representation from the boroughs and existing residents and amenity groups, and I think more formalised and effective joint working would mean we do not waste time on false starts and can move forward with plans that are sustainable and regenerative for the area.</p>	<p>No change proposed.</p> <p>OPDC Planning Committee includes four Councillors from the three Boroughs. OPDC Board includes the three leaders of the Boroughs, a local community member and a local business owner. OPDC Planning Committee recommended to Board that the proposed modifications be submitted to the Planning Inspector. OPDC Board approved the proposed modifications for submission.</p> <p>OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs. Regular Duty to Cooperate meetings were held with the boroughs, RBKC and TfL. A Duty to Cooperate Statement was submitted alongside the Submission Local Plan to the Planning Inspector.</p> <p>Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, a requested by OPDC's Planning Inspector.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 	N
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												<p>1,000 people visited the site, downloaded over 900 documents and watched over 400 videos.</p> <ul style="list-style-type: none"> • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		
8	Local Resident	Anita	Ringsell		1		Places		P7		<p>I endorse everything Theresa has said below and more. It was okay to maybe build a couple of tall towers in North Acton and away from nearby residential housing, but this has really gone over the top now and is out of hand. Many have been built overshadowing the residential houses there.</p>	<p>No change proposed.</p> <p>OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The proposed modifications for P7 and P7C1 relating to North Acton are limited and continue to seek high quality high density development. Other policies throughout the Local Plan require buildings and the public realm to be well-designed and these policies would be applied alongside design policies in the London Plan 2021.</p> <p>Policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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8	Local Resident	Anita	Ringsell		2		Places		P7		The heritage pub has gone and is supposed to be demolished. Heritage buildings should be valued as part of local history. The Castle Pub was the only little venue for the residents living there to meet up and have a drink.	No change proposed. OPDC's Local Plan policy TCC6 provides guidance for managing public houses and policy D7 for conserving and enhancing heritage assets.	N	
8	Local Resident	Anita	Ringsell		3		Environment and Utilities		EU4		We are already suffering with HS2 destroying green land, taking away bus stops and we have bad unhealthy air pollution to which they are contributing. Maybe you should ask the local Central Middlesex Hospital Respiratory Department for the stats on people suffering with lung disease who live locally. Greedy developers do not care about these things.	Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are contained within the Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction.	N	

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8	Local Resident	Anita	Ringsell		4		Spatial Vision				<p>We need Councillors on Planning Committees to stand with us, not against us, and stop approving all these high towers and data centres which are proposed to come on top of us. We need infrastructure, better roads, greenery, shops, doctors for both the long-suffering residents here and the new student population. We have plenty of the same here which is Shisha bars and Arabic restaurants which may do nice cuisine, but one or two would suffice.</p> <p>We must make a stand. I am an older person but I cannot see any future for the younger generation living here in these towers. I do feel that using this area like this is infringing on the residents basic human rights. Please stop using Park Royal area as a dumping ground. Other areas should take the brunt as well.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that benefits new and existing communities.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development. Unmodified and proposed modifications relating to Park Royal seek to ensure its role of London's most successful industrial estate is protected.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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9	Local Resident	Anna	Horsbrugh		1		General	Extent of changes			<p>I am writing to object to the latest modifications to your Local Plan for this area. My name is Anna Horsbrugh-Porter and I am a local resident in W10, living close to Scrubs Lane. I am also Secretary of the Friends of Little Wormwood Scrubs Park.</p> <p>My main points of opposition to the Modified Local Plan are as follows:</p> <p>Many of the 'modifications' to the Draft Local Plan are significant changes. We were not fully informed of these in the consultation letter you sent out in May of this year. That letter was misleading as the modifications proposes changes that will affect the local communities lives in a dramatic way. The consultation you have run is therefore inadequate.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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9	Local Resident	Anna	Horsbrugh		2		Places		P10C5		In particular, the proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan and cannot be treated as a minor modification.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This, therefore, enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

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9	Local Resident	Anna	Horsbrugh		3	MM/PS2/OPDC/P10C5/1	Places		P10C5		<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. This modification will destroy the views from our local open spaces - Wormwood Scrubs and Little Wormwood Scrubs. These skylines are part of the very essence of this 'common land' and are vital for our local communities, many of whom live in large housing estates in one of the most densely populated and deprived areas of the country.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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9	Local Resident	Anna	Horsbrugh		4	MM/PS2/OPDC/P2/1	Places		P10		<p>The lack of transport of improved road systems undermines the proposals for the proposed new developments. With no new overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL.. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
9	Local Resident	Anna	Horsbrugh		5		Places		P1		<p>There is no vehicle access from Scrubs Lane to the eastern end of the new Old Oak station. Without improvements, traffic issues will get worse. Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane sees longer queues every year. Why is a new Local Plan not dealing with this issue?</p>	<p>No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in it's own right, similar to Kings Cross. OPDC's aspirations for Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area. The station has been designed with the western entrance being the main station entrance, meeting all health and safety, including fire, regulations.</p>	N	

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9	Local Resident	Anna	Horsbrugh		6		General	Delay or withdraw the plan			<p>The Modified Local Plan highlights how out of date the Local Plan has become. There is little evidence that there is an appetite for high-density living, following Grenfell, Covid and social trends. Now is the time to step back and review the plan, not force through significant changes under the guise of 'modifications'. Make it a plan that reflects our future rather than one that becomes an empty symbol of the past.</p>	<p>No change proposed.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	

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10	Local Resident	Anne	Robinson		1		Places		P9		<p>I am writing to express my disagreement to the OPDC's March 2021 Local Plan which has been revised since 2018 with major changes that will affect me tremendously and detrimentally as a local resident of this area who has lived at my current address for almost 30 years.</p> <p>There has been little consultation with me or my neighbours as local residents on what will be massive changes to this area, whereby we will be surrounded by high-density, high-rise blocks and little green space for those who live in those blocks. This will have a direct impact on our low-rise residential grounds and private greens spaces which will be used and abused by those who don't live here or pay for the up-keep and maintenance of the grounds, green spaces and footpaths.</p>	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement.</p>	N	
10	Local Resident	Anne	Robinson		2		Places		P9		<p>I am so disappointed to see that little consideration has been given to providing a cohesive local neighbour with low rise properties that don't obscure rights to light, like the massive twin towers (40+ floors) currently going up at North Acton which have totally killed and obliterated the sunset I enjoyed through my windows over the years.</p>	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The specific approach to building heights in Channel Gate is evidenced through the Channel Gate Development Framework Principles and Grand Union Canal Massing and Enclosure Statement Update.</p>	N	

10	Local Resident	Anne	Robinson	3	General	Consultation	<p>It has been very difficult for me as a resident to even attempt to trawl through the reams of pages/documents to identify and assess the countless major changes that have been hidden in name changes of existing places, allocation of new names to areas for which the name change hasn't been explained or back referenced with help or explanation. It is an almost unfathomable task for the layperson to try to understand how they will be affected.</p> <p>I, as a resident, would have had to attend all related on-line events to understand just the basics of the name changes to the areas never mind the size and scope of the developmental changes planned.</p>	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phonenumber, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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10	Local Resident	Anne	Robinson		4		General	Extent of changes			It has been and will be totally unfair to existing residents to live with these massive changes hanging over us, not to mention the disruption caused due to planned years/decades of construction and demolition works, 24hrs of disturbance, air and noise pollution, traffic jams, temp lights, disruption to local bus services, road closures, footpath closures, littering, early morning construction site staff footfall with associated disruption and parking issues.	Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.	N	

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10	Local Resident	Anne	Robinson		5		Places		P9		<p>What is clear to me is that where I live will be surrounded by high-rise blocks, and this will have a detrimental impact on my neighbourhood and our local community, which is socially diverse with a wide age-range i.e. not just students like at North Acton Station vicinity.</p>	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The specific approach to building heights in Channel Gate is evidenced through the Channel Gate Development Framework Principles and Grand Union Canal Massing and Enclosure Statement Update.</p>	N	

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10	Local Resident	Anne	Robinson		6		General	Delay or withdraw the plan			<p>• Over the last 18 months+, the Covid-19 Pandemic has completely changed how I live and work and its impact will affect how many Londoners live and work in this area. I do not think the Covid impact has been properly taken into account in the March 2021 version of the Local Plan and there has been a missed opportunity to develop the sites and surrounding areas with the long-term health and well-being of those who live here at the forefront of thinking. A more sustainable, environmentally conscious approach is required for what may be a “live-work” space for many people for many years to come – a space that will have to adapt and accommodate the life-changing moments of residents throughout their lives.</p>	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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10	Local Resident	Anne	Robinson		7	MM/PS2/OPDC/P9/1	Places		P9		<ul style="list-style-type: none"> I am a resident that will be dramatically affected by new plans for the "Channel Gate" with high density high rise inserted into existing low rise residential areas. 	<p>No change proposed.</p> <p>Policy P9 places a strong emphasises on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage.</p> <p>Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p> <p>While OPDC has not provided detailed policy guidance on building heights for parts of the Channel Gate site which are not located adjacent to sensitive locations, the site allocation capacity for a minimum 3,100 homes has been determined through a design led process. This process assumed average shoulder heights of between 6 to 12 storeys across the much of the site. The delivery of some tall buildings were assumed, at appropriate locations, ranging in heights from 20 to 30 storeys.</p> <p>While taller building heights may be deemed appropriate as more detailed proposals are developed for the site, these have not been assumed in determining the capacity for the site allocation.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

10	Local Resident	Anne Robinson	8	MM/PS2/OPDC/P9/1	General	Extent of changes	<p>Hardly any consultation with local residents has occurred on this and, in my opinion, it should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1. Due to its name, I didn't recognise its proximity to where I live and missed the on-line event. This was not explained in the single page paper flyer which I received about the on-line events at the time.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. 	N
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												<ul style="list-style-type: none"> • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 		

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10	Local Resident	Anne	Robinson		9	MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1	Strategic Policies		SP7		<ul style="list-style-type: none"> It is clear to me that the locations for high density housing will NOT be 'well connected'. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on roads heavily congested will not be much help and will just contribute to high levels of traffic air pollution currently being experienced. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	

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10	Local Resident	Anne	Robinson		10		Strategic Policies		SP9		<ul style="list-style-type: none"> The Covid-19 Pandemic with its "Variants" has highlighted the limitations and isolation experienced by those living in high rise housing when under government enforced "Lockdown". This combined with the Grenfell flammable cladding scandal has negatively impacted those living in high rise blocks, many suffering from associated mental health issues and anxiety as a result. 	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
10	Local Resident	Anne	Robinson		11		Transport		T7		<ul style="list-style-type: none"> The 2021 Plan does not reflect the rapid changes taking place requiring increasing levels of delivery vehicles for online sales and it's associated traffic, adequate stopping places for such vehicles and storage/disposal of the excessive rubbish accumulation of all the packaging associated with this new way of shopping. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	

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10	Local Resident	Anne	Robinson		12		Transport		T1		<ul style="list-style-type: none"> New forms of transport, like electric scooters and electric cycles in addition to electric vehicles require a substantial number electric charging points or new ways to charge vehicles while stationary – where will this happen? How will the roads and pavements be shared with these new forms to transport – currently rules are being flouted and charge point locations are scarce. 	No change proposed. OPDC's policies for electric vehicle charging are set out in Policy T4 and meet the 2021 London Plan's requirements for new developments. The boroughs as highways authorities are also have a programme to rollout street charging points.	N	
10	Local Resident	Anne	Robinson		13	Figure/PS2/OPDC/PM2	Places		P10		<ul style="list-style-type: none"> From what I can understand the modified Local Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. The opportunity to connect these areas will be missed and we will be left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that benefits new and existing communities.</p> <p>The Local Plan continues to support sensitive enhancements to Wormwood Scrubs which would include the delivery of walking and cycling connections between communities to the east and west of Wormwood Scrubs. Other east-west walking and cycling routes are proposed further north of Wormwood Scrubs in Old Oak. The modified Local Plan is supported by a bus strategy which sets out a series of new and enhanced bus routes which would connect communities to the east and west of Wormwood Scrubs.</p>	N	

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10	Local Resident	Anne	Robinson		14	MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a	Places				<p>• The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. In my opinion the location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only Betting Shops, fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a.</p>	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways and betting shops.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	

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10	Local Resident	Anne	Robinson		15		General	Delay or withdraw the plan			<p>It is my understanding that Old Oak Common station will not be open for at least a decade and I think a fresh approach is required for the Local Plan that takes into account all of the comments I have made above and those made in previous communications, and all of the comments of my neighbours and the local community who will be severely affected by any and all major changes made to this area.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

11	Local Resident	Barbara Crowther	1	General Consultation	<p>I am writing in response to the modified local plan for Old Oak and Park Royal Development Corporation, to express my extreme concern about both the lack of due process and effective stakeholder communications about the modifications to the local plan, and the failure of the new plan to take on board the findings of the 2019 Planning Inspector's Report, and effectively adapt the plan following the loss of the CarGiant site for residential and office development.</p>	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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11	Local Resident	Barbara Crowther	2	General Consultation	<p>Failure of process I walk almost every day on Wormwood Scrubs, and use the Scrubs Lane up to Old Oak common as both a car driver and a cyclist. Yet as a local resident in North Kensington, I have not received any information about the plan or the consultation directly from OPDC or via RBKC. It is only because I am a member of Friends of Wormwood Scrubs that I am even aware of the proposals for development of this site.</p> <p>There appears to only be consultation with residents in immediately affected areas of Old Oak, not the surrounding population. I do not believe therefore that there has been adequate consultation or public engagement on the plan.</p>	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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11	Local Resident	Barbara Crowther	3	General Consultation	<p>Failure of process I found the documentation very difficult to follow, in terms of the actual changes to the plan, and how this development will also be able to meet our legal requirements for a transition to a zero carbon future.</p>	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. There were very limited changes to the zero carbon policies which seek to deliver the Mayor's requirements for sustainable development. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phonenumber, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a</p>	N
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												schedule of responses noting where further modifications are proposed.		

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11	Local Resident	Barbara	Crowther		4		General	Extent of changes			I note from friends living in Old Oak North that the letter they received suggested that there were not many changes in the new plan, except that plans for housing in Old Oak North were no longer going ahead but "protecting it as a place of employment". Whilst the Cargiant site has been lost in the plan, I believe this language offers a false and misleading sense of security to local residents that they are not about to be overshadowed by a massive high rise development.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
11	Local Resident	Barbara	Crowther		5		Spatial Vision				<p>Spatial Vision It is totally shocking that the vision for an area called "Park Royal" (ie a park) and "Old Oak" (ie a common and a woodland) is now being described as an industrial and 'high-density' area. The surrounding areas of North Kensington, Ealing and Hammersmith and Fulham have already been transformed beyond recognition through the development of the Westfield site, the rapid expansion of Imperial College high rise buildings, the A40, the Eurostar depot and rail lines, the Elizabeth Line - and most recently the complete loss of oak trees for the construction of the HS2 terminal at Old Oak. Levels of pollution in the area are already breaching international legal levels. Both the Mayor of London and surrounding boroughs are committing to Climate Change targets and must be part of a national drive to lower CO2 emissions and restore nature and biodiversity.</p>	<p>No change proposed. Park Royal is an established industrial estate. The areas proposed for development in Old Oak are not common land.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>OPDC considers the proposed modifications to be consistent with national policy including policies relating to mitigating and adapting to climate change. The proposed modifications are considered to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Policy EU4 ensures that air quality is addressed as part of all planning applications in the area.</p>	N	

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11	Local Resident	Barbara	Crowthier		6		Spatial Vision				<p>Spatial Vision In the context of the recent Grenfell disaster, any vision that relies on construction of a series of high rise buildings is highly insensitive and likely to have a huge impact on mental health in this area. During Covid lockdown, the wide open spaces of Wormwood Scrubs have been a life saving mental health resource in the midst of trauma. People in the area are currently watching all their local trees being felled for the construction of HS2 and the new Old Oak station hub. To destroy this skyline with a series of high rise buildings, adding to local traffic and pollution is totally the wrong direction for the Old Oak area.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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11	Local Resident	Barbara	Crowthier		7		Places		P12		<p>Spatial Vision It is neither healthy, nor sustainable. There will be an adverse impact on views from the Scrubs, which will become totally overcrowded by high rise buildings, which in turn will also hinder the wonderful migrations of birds that the Scrubs currently experiences because of its open nature.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. This includes considering views and heights of buildings. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Policy P12 protects Wormwood Scrubs as an important metropolitan park and Metropolitan Open Land and requires proposals to conserve and enhance the scrubs' biodiversity designations. Policy EU2 requires development to avoid disruption to biodiversity and requires an overall increase in green cover and a net gain in biodiversity.</p>	N	
11	Local Resident	Barbara	Crowthier		8		Spatial Vision				<p>Going Local The modifications proposed still fail to incorporate adequate green space within the development itself</p>	<p>No change proposed.</p> <p>The Local Plan requires proposals to ensure that 30% of developable land outside of SIL is delivered as publicly accessible open space. This standard has been benchmarked against other major regeneration projects in London to ensure that a best practice standard of public open space provision is being secured. This includes the delivery of two new Local Parks, of a minimum 2 ha in size.</p>	N	

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11	Local Resident	Barbara	Crowther		9		Spatial Vision				and I struggled to see any sense of a 'town/community' centre in the modified plan.	<p>No change proposed.</p> <p>The Local Plan identifies that development should help to deliver the new Old Oak Major Town Centre.</p> <p>The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p>	N	
11	Local Resident	Barbara	Crowther		10		Strategic Policies		SP9		The cluster of high rise buildings proposed seem incoherent with the language expressed in the overall vision and seem instead to focus much more the role of this area as a transport hub for the rest of London.	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	
11	Local Resident	Barbara	Crowther		11		Spatial Vision				There appears to be an assumption that green space is provided by Wormwood Scrubs, but there is a fragile ecology in the North and Western end of the Scrubs, which is an important site for wildlife and biodiversity, that could be destroyed with a hugely increased footfall associated with almost 20,000 new homes and 36,000 new jobs in the area. Any new development in Old Oak MUST make much more provision via community gardens, roof gardens, green verges and small parks, than is currently included in the plan and not look to the Scrubs to greenwash this development. This would be consistent with the concept of Old Oak Common and Park Royal.	<p>No change proposed.</p> <p>As a Metropolitan Park, Wormwood Scrubs will be a valuable asset for those living, working and visiting Old Oak, as it is for entire West London region and further afield.</p> <p>However, development identified within the Local Plan will not rely on Wormwood Scrubs or any other existing green spaces. The Local Plan requires proposals to ensure that 30% of developable land outside of SIL is delivered as publicly accessible open space. This includes the delivery of two new Local Parks, of a minimum 2 ha in size, and a series small public open spaces serving a variety of functions.</p>	N	

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11	Local Resident	Barbara	Crowther		12		Places		P10		<p>Transport</p> <p>There is no access to the new transport hub for those of us living towards Scrubs Lane and in North Kensington, which appears to be designed primarily as an interchange between the Elizabeth Line and HS2 for use by commuters into central London. The routes for localised entry or exit from the transport hub - especially for pedestrians and cycle users - are lacking.</p>	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Pedestrians and cyclists can access Scrubs Lane via two new pedestrian/ cycle bridges – one that connects with the eastern entrance of Old Oak Common station via the Grand Union Canal, and the second that connects Old Oak Common station via Union Way and Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
11	Local Resident	Barbara	Crowther		13		Strategic Policies		SP4		<p>Housing</p> <p>The plan has not been sufficiently modified to take account of the loss of the Cargiant site in terms of reducing the overall targets for new homes, instead relying on a high rise, high density to the rest of the development area that will adversely affect health and wellbeing as expressed above.</p> <p>There are significant modifications in this version of the Plan - at Channel Gate and the Mitre Way Cluster - which are wholly new, in terms of additional high density, high rise development.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL, including Channel Gate and Scrubs Lane. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>For both Channel Gate and Scrubs Lane, the development capacity, land use and infrastructure requirements are justified through a range of new and updated supporting studies, principally the Channel Gate Development Framework Principles, Scrubs Lane Development Framework Principles Update, the Development Capacity Study and the Preliminary Infrastructure Design and Costing Study.</p> <p>Both Channel Gate and Scrubs Lane were identified for development in the Submission Local Plan. OPDC considers that given the scale of development envisaged in these two locations (3,100 homes across Channel Gate and 3,500 homes across Scrubs Lane) both locations are suitable for town centre uses and housing at a range of densities as demonstrated in Local Plan supporting studies.</p> <p>The proposed modifications to the Old Oak North Policy P2 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. This includes information demonstrating how the Local Plan will continue to meet 2021 London Plan housing targets. This was carried out by identifying updated capacity and phasing information on sites already identified for mixed use development and releasing other sites for mixed use development that were previously identified for industrial uses. This includes the release of the Channel Gate site that was previously identified as a Strategic Industrial Location and has a similar developable area to Old Oak North. Delivering homes on this site and other sites means the Local Plan is able to continue to deliver homes and a reduction in the number of homes is not required.</p>	N	

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11	Local Resident	Barbara	Crowther		14		Design		D5		<p>Timing A high rise development in this part of West London, at a time when the Grenfell Tower inquiry is still live, is a huge insult to the local population.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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11	Local Resident	Barbara	Crowther		15		General	Delay or withdraw the plan			The ongoing Covid-19 pandemic is totally reshaping home and working lives, including reduction of commuting and a re-localisation of public life.	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
11	Local Resident	Barbara	Crowther		16		Transport		SP7		The new Old Oak station is not scheduled to open for around a decade (2029-33), and in the meantime transport pressure is growing in the area leading to a decline in air quality.	<p>Noted. The Ultra Low Emission Zone is due to expand across the OPDC area in October 2021 requiring tighter emission standards from vehicles, which will contribute to an improvement in air quality in the short term. The Local Plan sets a range of policies to support a mode shift away from private vehicles in addition to the Old Oak Common station, from measures to increase walking and cycling, to upgrading existing stations, requiring EV charge points and a bus strategy. All these measures will reduce transport pressure and improve air quality.</p>	N	
11	Local Resident	Barbara	Crowther		17		General	Delay or withdraw the plan			The impact of the pandemic changes everything in relation to a Local Plan, including the relationship between a local transport hub, the need for affordable (including social) housing in the area in light of the economic downturn and loss of jobs and increased numbers of people on Universal Credit whilst the process of recovery gets underway, requires a bigger rethink than the revised modified plan currently represents.	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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11	Local Resident	Barbara	Crowther		18		Environment and Utilities				<p>The Government is talking about a Green Economic Recovery - there is an opportunity to create a much stronger ecological vision for the area being developed than at present, and create public goods for public health, green jobs, ease of local public transport with proper pedestrian and cycle routes locally.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that is an exemplar in healthy and sustainable large-scale development.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>OPDC considers the proposed modifications to be consistent with national policy including policies relating to mitigating and adapting to climate change. The proposed modifications are considered to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has been working closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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11	Local Resident	Barbara	Crowther		19		General	Delay or withdraw the plan			A more considered longer-term review and re-vision of the plan is required, allowing for a proper process with adequate public consultation, not a misleading process at a time the nation is distracted by coronavirus and Brexit related disruption.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information, address impacts of Brexit and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
12	Local Resident	Belinda	Shand		1		Strategic Policies		SP9		I am a resident and business in North Kensington. I share the views of St Quintin and Woodlands Neighbourhood Forum and don't agree with the fundamental principles of high density high rise living in this part of London and urge you and the developers to totally rethink and reshape their proposals.	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.</p> <p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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12	Local Resident	Belinda	Shand		2		Strategic Policies		SP4		Lack of a realistic housing need reappraisal: in most cases assumptions of continual exponential growth have been proved wrong and in any way shouldn't be encouraged	No change proposed. The modifications have been proposed in response to the Planning Inspector's Interim Findings and to ensure general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets. The modifications ensure that OPDC can help meet local and London housing needs, including affordable housing. The Secretary of State for Housing, Communities and Local Government's December 2020 ministerial statement on housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs which if anything, points to an increased need for housing since OPDC submitted its Local Plan. Notwithstanding this, Government requires that Local Plans are reviewed within 5 years of adoption and housing needs would be picked up within this review, at which point, the impacts of the Covid pandemic on housing needs will be clearer.	N	
12	Local Resident	Belinda	Shand		3	MM/PS2/OPDC/P2/1	Places		P10		Lack on integrated infrastructures: with no new Overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is the 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. If anything, the previous housing numbers should come down at locations where public transport is inadequate.	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	

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12	Local Resident	Belinda	Shand		4		Places		P10		Current inadequacy of the local road network: see for instance frequent long queues at North Pole Road and its junction at Wood Lane/Scrubs Lane and heavy traffic generally.	Noted. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. Policies within the Local Plan seek to minimise car parking and ensure that impacts on the road network during construction are minimised.	N	

12	Local Resident	Belinda Shand	5	MM/PS2/OPDC/P10C5/1	Places	P10C5	<p>There is no evidence that High rise housing is where many people and families want or need in the future The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. More residential towers are also planned for Scrubs Lane. How were we meant to hear about these latest plans? They will destroy the views from our local open spaces.</p>	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and 2021 London Plan provide policies to ensure this is secured through the development management process.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. 	N
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												<ul style="list-style-type: none"> • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		
13	Land owner	Claire	McLean	Canal and River Trust	1		General	General			The Trust has previously provided comments in respect of the Regulation 19 consultation (letters dated 7 September 2017 and 27 July 2018) and we note that OPDC will continue to consider responses to the Regulation 19 consultation for the purposes of the Independent Examination and that these have been submitted to the Planning Inspector to be considered alongside our response to this consultation. This being the case, the following comments are focussed on the changes made to the revised draft plan and supporting studies. 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.	Noted.	N	

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13	Land owner	Claire	McLean	Canal and River Trust	2	MM/PS2/OPDC/P1/16	Places		Policy P1	4.16	<p>Reference MM/PS2/OPDC/P1/16 Submission Policy OOS.11, Updated para 4.16 Modification: Delivering Old Oak Street as a high quality route will be particularly important for connectivity as well as providing walking and cycling access to the Scrubs Lane. Reason: To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Consequently, Old Oak Street connecting Old Oak South to Old Oak North cannot be delivered. However, an eastern access to Old Oak Common Station continues to be required and will be delivered as a walking and cycling connection to Scrubs Lane via the Grand Union Canal towpath.</p> <p>The Trust and OPDC have discussed the potential for the towpath to be used as part of the pedestrian and cycle eastern access to Old Oak Station, providing access to and from Scrubs Lane. We raised a number of concerns regarding this, and we require further information about expected modelled usage, as the towpath is already likely to experience significant increased usage from the other proposed development in the plan area, without the direct station access as well. These concerns would need to be addressed before we could accept this proposal, and we therefore have concerns about the paragraph above, which suggests the towpath will be the delivered route.</p> <p>Reference Figure/PS2/OPDC/3.10 This plan now shows east station access route along the towpath, described as New and enhanced pedestrian and cycle connections As described above, the Trust are not yet able to confirm that this route is deliverable on the scale required for a main station access, with a similar capacity of Waterloo Rail Station. The Wormwood Scrubs Street might face similar challenges within in (or beside) its green space, so we would suggest that this connection should be shown more aspirationally, as being a potential route. The Trust supports the intention . However, in this location, at this stage we would do so with caution, as the viability of this route depends on balancing the need to maintain the green corridor of the canal environment and its heritage (the Grand Union Canal is a conservation area). The same comment applies to the following references: <ul style="list-style-type: none"> • MM/PS/Q6 Figure/PS2/OPDC/4.2 • MINOR/PS/Q1b Figure/PS2/OPDC/4.5 • Figure/PS2/OPDC/4.6 • Figure/PS2/OPDC/4.7 These all indicate eastern access to the Old Oak Common Station via the Grand Union Canal, which is still only a potential access proposal, and may not be deliverable.</p> <p>Reference MM/PS2/OPDC/P1/5 This modification also refers to "Delivering...the walking and cycling route from Old Oak Common station to Scrubs Lane." We would reiterate that if this refers to the towpath route, this cannot be confirmed, for the reasons given above. Reference MM/PS2/OPDC/P1/17 on page 25 suggests the future link from Old Oak Street to Wormwood Scrubs may not be delivered, but requires this to be safeguarded if relevant and appropriate. However, reference MM/PS2/OPDC/P10/10 on page 53 states that "Old Oak Common Station will also be within 10 minute walking distance from Scrubs Lane, accessed via a new pedestrian and cycle link from the Grand Union Canal." These statements appear to be contradictory, and we are also concerned, as described in our comments above, that the Local Plan should not confirm this towpath connection to the station, given the Trust's concerns about its viability, and impact on the canal environment and heritage.</p>	<p>No change proposed. The Local Plan highlights an intention rather than a detailed design proposal for this footbridge and OPDC looks forward to working with CRT in due course on more detailed modelling, engineering and design work which would need to be undertaken in advance of the submission of any planning application for the bridge. CRT would be a key stakeholder in this future modelling, design and engineering work looking at the construction of the bridge and associated towpath upgrades. CRT would need to approve any works that connect to or directly enhance the towpath.</p> <p>The Local Plan references (MM/PS2/OPDC/P1/17 and MM/PS2/OPDC/P10/10) are not contradictory as these refer to two separate proposals; the first a pedestrian/ cycle bridge to Wormwood Scrubs to be delivered beyond the plan period, and the second the pedestrian/ cycle bridge linking Old Oak Common station to the canal towpath being delivered within the plan period.</p>	N	

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13	Land owner	Claire	McLean	Canal and River Trust	3	MM/PS2/OPDC/P10/17	Places		P10		Reference MM/PS2/OPDC/P10/17 A parallel walking and cycling connection to Kensal Canalside would be supported, in addition to the existing towpath connection (which should be enhanced where appropriate).	Noted. Wormwood Scrubs Street in the OPDC area will join with South Street in RBKC providing an all modes route.	N	
13	Land owner	Claire	McLean	Canal and River Trust	4	MINOR/PS/Q12Q13 Q16(1)	Places		P1		References MINOR/PS/Q12Q13 Q16(1) and MINOR/PS/M3c(1), and MM/PS2/OPDC/P1/16 - Old Oak Street References to Old Oak Street, including the above, describe it as an all modes connection from Old Oak Common Station to Scrubs Lane (although this is not clearly shown on the map in reference Figure/PS2/OPDC/4.2). Could you confirm if there is an alternative route to the towpath? Otherwise, the walking and cycling provision (but not other modes of course) either relies on the towpath east of the station, or on the bridge to the new Wormwood Scrubs Street, to connect up to Scrubs Lane from there (beyond the timeframe of the plan). Therefore, as above, we would express caution for a proposed route that relies entirely on the towpath, given our concerns about viability, environmental and heritage impacts. The Wormwood Scrubs option, in parallel to the towpath, will eventually be a useful parallel route through to Kensal Canalside and Ladbroke Grove in due course, and if this is deliverable (given it relies on Network Rail land).	No change proposed. There is an alternative pedestrian cycle connection between Old Oak Common Lane and Scrubs Lane via Union Way and then a new pedestrian/ cycle bridge over the canal linking to Hythe Road. This route is shown in Figure 3.10.	N	
13	Land owner	Claire	McLean	Canal and River Trust	5	MINOR/PS/Q1b Figure/PS2/OPDC/3.15	Strategic Policies		SP9		Reference MINOR/PS/Q1b Figure/PS2/OPDC/3.15 - Sensitive locations and tall buildings Adjacent to the Grand Union Canal, this designation has been extended to the west of Old Oak Lane. This had previously been concentrated in the Old Oak Common area (although some of this remains after the plan period). We would therefore request that development close to the canal should be designed to step height and massing away from the canal, to avoid potential canyoning and overshadowing effects, particularly as this extended area lies to the south side of the canal, so having more potential for overshadowing. The Grand Union Canal is designated a conservation area, so there should be particular sensitivity to adjacent building design which may be contrary to the designation for tall buildings. Page 48 of the Minor Modifications, references MM/PS2/OPDC/P8C1/7, MM/PS/Q12Q13 Q16(1) and MM/PS/M3c(1), M M/PS2/OPDC/P8C1/8 MINOR/PS/General1, refers to "generally 6 to 8 storeys facing on to the Grand Union Canal, with generally 10 storeys along Union Way 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 the canal corridor, not least in terms 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, and 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), with breaks along the canal frontage. With these previous comments in mind, we are also concerned about the proposed 10 storeys along Union Way, and the potential impact on the canal environment.	No change proposed. OPDC considers the proposed modifications and unmodified policies, including policy P3, provide justified appropriate guidance and flexibility to deliver development that conserves and enhances the biodiversity and heritage designations of the Grand Union Canal while providing appropriate levels of amenity. Cross cutting policies will continue to be applied. These include policies SP9 and D3 regarding building design in relation to facade design and massing alongside policy D1 regarding frontages and their relationship with the public realm.	N	

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13	Land owner	Claire	McLean	Canal and River Trust	6	Figure/PS2/OPDC/4.7	Places		P2		Reference Figure/PS2/OPDC/4.7 - Bulls Bridge At reference Figure/PS2/OPDC/4.7 we note that a new bridge connecting to Hythe Road is referred to as "Bulls Bridge". Would would request that this is given a different name, as there is already an existing Bulls Bridge on the Grand Union Canal, which is grade II listed and also marks the junction between the main Grand Union Canal, and the Paddington Arm. Historically and navigationally, an additional Bulls Bridge would therefore cause confusion. See existing bridge at this link: https://www.google.com/maps/place/Bull's+Bridge/@51.5000957,-0.4069626,18z/data=!4m1!3m1!3m6!1s0x487672967091d2dd:0x8a5623267ff91028!2sBulls+Bridge+Rd,+Southall!3b1!8m2!3d51.4978432!4d-0.399034!3m4!1s0x4876729138012051:0x5e67238fd6252e76!8m2!3d51.4999134!4d-0.4066811	No change proposed. This bridge is named after a historic bridge that was previously on the site. OPDC considers sufficient distinction can be provided should the need to refer to both bridges arise.	N	
13	Land owner	Claire	McLean	Canal and River Trust	7	Figure/PS2/OPDC/7.5	Transport		T2		Reference Figure/PS2/OPDC/7.5 We note that a path is proposed along the northern side of the canal, to the west of Old Oak Lane (shown in the cover image too). We do not generally support a blanket approach to offside (non-towpath side) paths as they can reduce opportunities for ecology and secure moorings, and can lead to maintenance issues and anti-social behaviour. We would also be concerned that unless there is a clear destination, a short length of offside walkway could be vulnerable to anti-social behaviour.	No change proposed. This route is proposed along the Channel Gate site provides waterfront access in an area proposed for high density housing and connects to a proposed bridge across the canal into the southern part of Channel Gate. OPDC is committed to working with the Canal & River Trust as proposals develop for this site and this route to ensure that issues around maintenance and anti-social behaviour are appropriately addressed.	N	
13	Land owner	Claire	McLean	Canal and River Trust	8	Figure/PS2/OPDC/4.27	Places		P8		Reference Figure/PS2/OPDC/4.27 (page 41 of Table of figure modifications) We note that a new bridge is shown across the Grand Union Canal at the Channel Gate Local Park (Area of search). We are yet to be convinced by the case for a crossing within the Channel Gate area, a short distance to the north-west of Old Oak Lane, and would need to review the potential impacts this would have on the canal corridor before we could agree to its principle. We are happy to discuss this matter further with the OPDC and have no objection to its inclusion within the plan, given that the plan recognises the need to agree the delivery of crossings with the Trust.	Noted.	N	
13	Land owner	Claire	McLean	Canal and River Trust	9	MM/PS2/OPDC/P4/6	Places		P4		Reference MM/PS2/OPDC/P4/6 page 32-33 The canal is the northern boundary of this area, so we would like to add to the policy objective PRW.6: " - creating and upgrading cycle lanes to deliver a joined up cycle route network, including the towpath of the Grand Union Canal."	No change proposed. The role of the Grand Union Canal in providing a high quality east-west cycle route is stated under Policy P3.	N	
13	Land owner	Claire	McLean	Canal and River Trust	10	MM/PS2/OPDC/P6/13	Places		P6		Reference MM/PS2/OPDC/P6/13 page 39 As above, we would like to add the following to policy PRC.7: " - creating and upgrading cycle lane to deliver a joined up cycle route network, including the towpath of the Grand Union Canal."	No change proposed. The role of the Grand Union Canal in providing a high quality east-west cycle route is stated under Policy P3.	N	

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13	Land owner	Claire	McLean	Canal and River Trust	11	MM/PS2/OPDC/P10C4/2	Places		P10C4		Reference MM/PS2/OPDC/P10C4/2 page 67 We note the reference to a further walking and cycling bridge next to Mitre Bridge and the railway bridge. This hasn't been mentioned in our recent discussions with OPDC about improving the access from Scrubs Lane to the towpath, and it would be helpful to clarify if this is still a consideration. A new walkway adjacent to Mitre Bridge with the aim of providing a fully accessible connection to the towpath may be a better solution. However, we note that on page 68 the wording referring to a new connection to Mary Seacole Gardens being delivered has been deleted.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, OPDC is committed to continuing to work with the Canal & River Trust as this alternative proposal is developed and proceeded with.	N	
14	Land owner	Jonathan	Smith	Cargiant	1		General	General			Our client agreed a Statement of Common Ground with OPDC on 17th February 2021 following constructive engagement and based on draft changes seen prior to that point. These modifications have been carried into the published draft and so Cargiant maintains its position set out in this Statement of Common Ground.	Noted.	N	
14	Land owner	Jonathan	Smith	Cargiant	2		Places		P2		These modifications protect Cargiant's land for industrial use and allow for its future intensification. This change to the policy allows Cargiant to now bring forward its proposals for significant investment in its car plant which will create and support additional jobs, strengthen Old Oak North as an employment location and contribute positively to place creation in the new mixed-use neighbourhood being created along Scrubs Lane.	Noted.	N	
14	Land owner	Jonathan	Smith	Cargiant	3		General	General			We would like to reserve our position to expand on our representations if either the Inspector considers that any change to the modifications document is required or if any third party seeks changes that affect Cargiant. As such we request to be kept fully informed of each stage of the process through to adoption.	Noted. OPDC will continue to update stakeholders as the Local Plan continues to adoption.	N	

15	Local Resident	Carmel	McLoughlin	1	Places	P10	<p>As a long time user of Wormwood Scrubs I have followed with interest the proposals for change to this area with the establishment of the OPDC. I am struggling to make sense of the modified draft Local Plan proposals. They seem to lack any coherency, and do not reflect what is happening on the ground.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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15	Local Resident	Carmel	McLoughlin		2		Places		P10		<p>With the loss of Car Giant site I understand that the vehicle accessway from the east to the new Old Oak Station interchange is now no longer a possibility. Yet this seems to be still included within the proposals. Therefore any proposed development in this area to the east of the new Station will have no direct access to the new rails links proposed, and will therefore be limited to using the current road infrastructure, which is grossly inadequate now, not to mention when, if these proposed new builds proceed, were under construction or to be occupied. Alternative public transport links are also totally inadequate. The proposals for a number of high-rise residential towers for this area adjacent to Scrubs Lane is therefore totally misconceived and untenable.</p>	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
15	Local Resident	Carmel	McLoughlin		3		Places		P12		<p>The Scrubs is an area of some 80 hectares of MOL close to the centre of London highly valued for its ecology, its bird life, and above all its sense of openness and semi-rural environment. We are fortunate in having Wormwood Scrubs which is a lifeline for many of us living in London especially in these Covid times. Utilising open spaces in the natural environment is hugely beneficial to the health and well-being of those users. However, with development of dense high rise buildings on at Old Oak Common Lane and Park Royal blotting the skyline, a major aspect of the 'more wild than tamed' nature of the Scrubs is being eroded. With the proposals for further high rise buildings proposed in Scrubs Lane and adjacent areas, this is going to have a further diminishing effect on our mental well-being. I am aware that development of buildings which would block the views from Hampstead Heath to the City is totally prohibited, and its time that a similar approach is pursued for other areas of MOL which currently enjoy open aspect views. The current planned proposals will be very detrimental to unfettered views currently enjoyed on Wormwood Scrubs. Please please let's have a halt to this misconceived, incoherent, cobbled together local plan which has little relevance to our lives today.</p>	<p>No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The assessment of the impacts of tall buildings undertaken as part of the Scrubs Lane Development Framework update has found that there is no increased impact on Wormwood Scrubs as a result of the proposed modifications.</p>	N	
16	Politician	Caroline	Pidgeon AM		1		General	Consultation			<p>Firstly, I am pleased that OPDC appears to have improved engagement with stakeholders, but it will be essential that this engagement is maintained if this Local Plan is to be a success. This Local Plan must not be one that is delivered in a 'top down' way; it must continue to involve and genuinely engage with residents and key stakeholder groups in the area if it is to be a success.</p>	<p>Noted. OPDC's Statement of Community Involvement (SCI) sets out OPDC's ongoing commitment to support local people in engaging and shaping planning policy documents. The SCI and the Local Plan also set out information for how OPDC will support neighbourhood planning groups in the development of their Neighbourhood Plans.</p>	N	

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16	Politician	Caroline	Pidgeon AM		2		General	Delay or withdraw the plan			I am, however, concerned that the Local Plan does not seem to have considered any changes to London's work and living habits as a result of the ongoing COVID-19 pandemic. The impact of COVID-19 will be long lasting and has accelerated long-term patterns of change around how people work, travel and engage with their local communities and high streets. I strongly believe more detailed analysis on the impact of the COVID-19 pandemic on existing plans must be undertaken urgently if this plan is to be both transformative and truly robust for the future.	No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	
16	Politician	Caroline	Pidgeon AM		3		Places			P4	I very much welcome the focus that is being included in the Local Plan to reduce through traffic and encourage, promote and create more walking and cycling routes for those traveling within and through the OPDC area. However, I do have concerns about the effort to reduce through traffic within the OPDC area. Although, of course, I support the reduction of through traffic when done properly, my concern is that OPDC is looking at through traffic reduction in a silo. Reducing through traffic within the OPDC area is all well and good but if this is not being considered in consultation with the neighbouring boroughs it could create excess traffic congestion in other parts of the boroughs which could have a negative environmental impact. I would urge OPDC to ensure that all schemes to reduce through traffic are done in consultation with neighbouring boroughs and considered within the context of the wider road network of West London.	No change proposed. Measures to reduce through-traffic will be developed in consultation with the local highways authorities of Brent, Ealing and Hammersmith & Fulham, whose areas extend beyond the OPDC boundary. OPDC has a monthly meeting with these transport officers and TfL to discuss and collaborate on the development and delivery of all transport interventions in the Local Plan.	N	
16	Politician	Caroline	Pidgeon AM		4		Delivery and Implementation				As already stated, I very much support many of the interventions, especially around improving the public realm and creating more active travel routes, but another major concern with many of these proposals is timing. Whereas with much of the housing and infrastructure delivery OPDC has provided relatively detailed anticipated timescales, many of the plans around public realm improvements and active transport infrastructure provide little in terms of timescale for delivery. The timely delivery of many of these interventions will be key, especially to ensure they align with the delivery of so many new homes within the OPDC area. I encourage OPDC to set out a clearer timescale for delivery for the transport interventions.	No change proposed. The infrastructure Delivery Plan (IDP) identifies timelines for delivery of all infrastructure projects, including for public realm and active transport infrastructure. This timelines have been informed by timelines for development sites, as evidenced by the Development Capacity Study, which will either deliver, contribute towards or will need to be unlocked by these projects. Policy DI2 (Timely Delivery and Optimised Phasing) clarifies that OPDC will look to secure the timely delivery of infrastructure required to support the needs of development.	N	
16	Politician	Caroline	Pidgeon AM		5		Transport				I have continuously pushed OPDC to give more consideration to the transport options available to those working on the Park Royal site. I still do not believe this revised Local Plan gives serious consideration to this. If OPDC is serious about reducing car use within the OPDC-area then consideration needs to be given to sustainable active or public transport options to those working on the Park Royal estate. Without good, reliable public and active transport options those working at Park Royal may well continue to rely on cars given the size of the estate and the difficulties many have accessing their workplaces quickly and easily at present if not using a car.	No change proposed. The Local Plan includes a range of policies to support active travel and public transport use in Park Royal. The Infrastructure Delivery Plan includes a comprehensive network of roads to upgrade and new routes to make walking and cycling attractive travel options. The Local Plan is accompanied by a bus strategy for increasing bus services across Park Royal, including a new bus route passing through the industrial estate connecting Hanger Lane to Old Oak Common Station. Policy P6 also supports the removal of through traffic to reduce vehicle traffic from Park Royal streets.	N	

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16	Politician	Caroline	Pidgeon AM		6		Housing		H2		Although I very much welcome ambitious targets for quality new homes, of which a significant amount will be affordable, I am concerned that this revised plan and the modifications do little more than identify sites where sufficient housing can be fitted, to make up the shortfall in housing units resulting from OPDC's 2019 'change of direction' and abandonment of plans for the Cargiant land at Old Oak North.	Noted. The modifications have been proposed primarily in response to the Planning Inspector's Interim Findings for Cargiant, Old Oak North and to ensure general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets. Other modifications have been required to ensure general conformity with the Mayor's 2021 London Plan, to ensure alignment with the changes to the Use Class Order introduced in September 2020, Modifications requested by the Planning Inspector during the examination in public, prior to the issuing of the interim findings in September 2019 and Modifications made to the submission Local Plan, post Regulation 19 consultation but prior to submission of the Local Plan to the Planning Inspectorate in October 2018. Sites for additional housing capacity have been carefully selected to ensure that development delivers a high quality environment for residents.	N	
16	Politician	Caroline	Pidgeon AM		7		Places				Regarding the new areas of focus for housing delivery, the so-called 'Western Lands', I am concerned at the stark difference in terms of the previous plans for the Old Oak North site and the new focus-area for housing delivery. There appears to be no vision of a significant regeneration in the same way as there was for Old Oak North. From what I can see, there will be no new high street, major cultural hub, or open spaces. I am also particularly concerned that there will be no new station at Hythe Road and no new road network connecting the eastern and western side of Wormwood Scrubs.	<p>No change proposed.</p> <p>The Western Lands programme does not form part of the Local Plan's evidence as this work relates to OPDC's delivery functions. Relevant Local Plan supporting studies have been updated and new studies have been produced to support the proposed modifications and respond to the Inspector's Interim Findings.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>OPDC considers that the proposed modifications will ensure that the OPDC area will continue to make a major contribution to West London's and the capital's economy while providing opportunities for employment and training for Londoners local people. The modifications continue to deliver the Old Oak major town centre that is located closer to existing communities and public transport links. As per policies SP6, TCC4 and TCC7 OPDC will support proposals which seek to deliver new cultural quarter at Old Oak and potential catalyst uses in area.</p> <p>Policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
17	Local Resident	Catherine	Gallimore		1		Transport		T1		These are my objections to the OPDC plan for development of Channel Gate area 1. Surrounded, as we are, by railway lines, there are very few roads accessing the area and these were often congested before HS2 - now they are a nightmare and will not support massively increased housing in the area. (Eg A4000/Old Oak Lane/Victoria Rd, central Harlesden, Tubbs Road) Have these issues been properly thought through?	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth.	N	

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17	Local Resident	Catherine	Gallimore		2		Strategic Policies		SP4		<p>These are my objections to the OpDC plan for development of Channel Gate area</p> <p>2. People's housing needs are changing post-pandemic with people able to work from home outside London. Is this the time to be building huge quantities of London homes? Have these issues been properly thought through?</p>	<p>No change proposed. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel. Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to embed future requirements to support the recovery from Covid.</p>	N	
17	Local Resident	Catherine	Gallimore		3		Design		D5		<p>These are my objections to the OpDC plan for development of Channel Gate area</p> <p>3. High rise homes are currently very unpopular following the Grenfell fire and cladding issues. Have these issues been properly thought through?</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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18	Local Resident	Catherine	Sookha		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>OPDC considers the plan to be sound and that it effectively meets the needs of both existing and new future residents.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
18	Local Resident	Catherine	Sookha		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The principle for delivering high quality high density mixed use development in areas outside of SIL has not been modified as part of the proposed main modifications. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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18	Local Resident	Catherine	Sookha		3		General	Delay or withdraw the plan			<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
18	Local Resident	Catherine	Sookha		4		General	Extent of changes			<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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18	Local Resident	Catherine	Sookha		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
18	Local Resident	Catherine	Sookha		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
18	Local Resident	Catherine	Sookha		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
18	Local Resident	Catherine	Sookha		8		Transport		T4		<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	

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18	Local Resident	Catherine	Sookha		9		Housing				<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> • High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
18	Local Resident	Catherine	Sookha		10		General	Delay or withdraw the plan			<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> • We would ask for the plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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18	Local Resident	Catherine	Sookha		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
18	Local Resident	Catherine	Sookha		12		Places		P8		<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would block out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park adjacent to the station and to the north of the Old Oak Common Station Adjacent Station Development Site.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

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18	Local Resident	Catherine	Sookha		13		General	Community cohesion and character			<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> • Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
18	Local Resident	Catherine	Sookha		14		Environment and Utilities		EU4, EU5		<p>These are the key points I, along with the Wells House Road Residents Association, would wish to make:</p> <ul style="list-style-type: none"> • If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
19	Local Business	Chloe	Fremantle Blegvad		1		General	Extent of changes			<p>We are very concerned to see that the OPDC Plan has changed significantly since it was initially submitted in 2018</p>	<p>No change proposed. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>The majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p>	N	

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19	Local Business	Chloe	Fremantle Blegvad		2		General	Consultation			We have also been very disappointed by the Lack of sufficient consultation on these changes - we consider it to have been woefully inadequate, especially on proposing the Channel Gate as a future housing site and 'major town centre'- that must be a pie in the sky dream!	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development. The Local Plan previously identified Atlas Junction as a neighbourhood town centre. The proposed modifications continue to identify town centre uses in Channel Gate centred around Atlas Junction as part of a modified Old Oak major town centre.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
19	Local Business	Chloe	Fremantle Blegvad		3		General	Support for community group comments			We fully support the representations from the Old Oak Neighbourhood Forum	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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20	Local Resident	Chris	Peyton_1		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
20	Local Resident	Chris	Peyton_1		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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20	Local Resident	Chris	Peyton_1		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
20	Local Resident	Chris	Peyton_1		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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20	Local Resident	Chris	Peyton_1		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
20	Local Resident	Chris	Peyton_1		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5, T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
20	Local Resident	Chris	Peyton_1		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
20	Local Resident	Chris	Peyton_1		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	

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20	Local Resident	Chris	Peyton_1		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
20	Local Resident	Chris	Peyton_1		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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20	Local Resident	Chris	Peyton_1		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
20	Local Resident	Chris	Peyton_1		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

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20	Local Resident	Chris	Peyton_1		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
20	Local Resident	Chris	Peyton_1		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	

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20	Local Resident	Chris	Peyton_2		15		General	Delay or withdraw the plan			<p>I'm writing to object to your modification to the Local Plan in West London / Park Royal area. I firmly believe it is not fit for purpose, and requires more than just modifications to the current plan to make it workable and fulfil your objectives.</p> <p>Further to my objection letter the other day, I'd like to add in other salient points.</p> <p>You are now in a position to create a post-covid poster-child 'town of the future'; Just modifying a 5 year old plan seems odd, and smells of desperation. The area is changing rapidly due to HS2 and its ever moving targets and the 'Make it us as they go long' system they are adhering to. Add in the wider changes due to COVID - work / life changes, removal of the office for most, the desire to move away from cities, the work / life balance scenario, its seems nuts to just tighten a few bolts on the old plan.</p> <p>Please note - I live in Wells House Road, and have lived in the wider in the area for 15 years and have a desire for the area to finally come of age, with new homes, business and retail to live harmoniously and prosper; This modification a shoe-horning to get something in place quickly, despite the evidence to rethink, only to appease the need to hit the housing numbers of the London Plan.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
20	Local Resident	Chris	Peyton_2		16		Transport				<p>Details below.</p> <p>- The proposed area has changed dramatically and it will no longer will be as connected, nor accessible. The removal of two supporting stations (Old Oak and Hythe Lane); The removal of the Car Giant site (and off-loading the fallout residential / retail reqs to other smaller sites) and the recent confirmation that there is no plan (as of yet) for the Eastern access to the new station means its needs a ground up rethink - its MASSIVE changes.</p>	<p>No change proposed. OPDC's aspirations for HS2's Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. Scrubs Lane itself is identified in the Local Plan for upgrading, with a new two-way cycle lane proposed to provide segregation of cyclists from general traffic and a widened footpath as developments come forward on the western side.</p>	N	
20	Local Resident	Chris	Peyton_2		17		Transport				<p>Removing the Eastern access point for the HS2 station in itself is huge; Currently there is no feasible option for anyone on Scrubs Lane and the proposed developments there to access the new HS2 station - nor get anywhere, really. A bus through Harlesden to the HS2 station is is both unworkable and the currently the best option. Other stations are miles away, with no way the roads can be widened (due to the iron bridge at the top) for cyclists and scooters, or the pavement widened for pedestrians. If you have ever cycled up Scurbs lane you will know how intimidating it is - Motorists HATE you, and can only imagine what will happen with increased numbers.</p>	<p>No change proposed. OPDC's aspirations for HS2's Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. Scrubs Lane itself is identified in the Local Plan for upgrading, with a new two-way cycle lane proposed to provide segregation of cyclists from general traffic and a widened footpath as developments come forward on the western side. This will provide improved routes to nearby existing stations with Willesden Junction Station being a 15 minute walk or 8 minute cycle ride from Mary Seacole Gardens on Scrubs Lane.</p>	N	

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20	Local Resident	Chris	Peyton_2		18		Places		P3		The canal as a major route for pedestrians, cyclists, scooters, and recreational users is not a viable option. COVID has shown it can't handle the small uptick as it is, let alone the numbers OPDC and HS2 are bringing to the area. The southern towpath is only a metre wide in places, with water on one side and a 20 metre drop on the other. The northern edge is the unusable Car Giant / Powerday sites, and Kensal Cemetery. These are going anywhere. Maybe, in decades, they will be gone or some access resolved. But building now, for a problem that'll only solved in decades leaves decades of pain for all involved. It needs a proper solution before you build.	No change proposed. The Local Plan and IDP propose a series of enhancements to the canal towpath. This policy has not been modified in response to the Inspector's Interim Findings or any other directions from the Planning Inspector.	N	
20	Local Resident	Chris	Peyton_2		19		Strategic Policies		SP8		Kensal cemetery should not be considered a green space. Yes, It is green because of the grass around the graves but it is hardly recreation ground.	No change proposed. Cemeteries are recognised as a type of open space, and so have been identified for protection in the Local Plan in that context. While they do serve some recreational value for the local community, they are not being relied upon to meet the needs of public open space for new development.	N	
20	Local Resident	Chris	Peyton_2		20		Transport		T6		No interchange for various lines / removing Old Oak and Hythe Lane station make the area less desirable. Surely this alone is means the plan is out of date?	No change proposed. The OPDC area will be served by a number of different Underground and Overground lines. Old Oak Common station will be a key interchange between HS2 and the Elizabeth Line, and the proposed Old Oak Common Lane station, less than 5 minute walk from Old Oak Common station, will provide interchange and connectivity to the Overground and new West London Orbital lines. Old Oak Street will provide a new pedestrian/ cycle link connecting these stations to North Acton and the Central Line. In addition, upgrades are proposed to improve walking and cycling routes to Willesden Junction station, which is served by the Bakerloo Line and three Overground lines. Both North Acton and Willesden Junction stations are proposed for major upgrades.	N	
20	Local Resident	Chris	Peyton_2		21		Strategic Policies		SP6		Splitting the town centre across two sites (The station site and Channel Gate) is crazy - its not splitting, it is two unique areas. If you have spent anytime in the area you will know it is a wasteland between these sites, and you plan no development in the area that connects the two in a meaningful way, nor could you. It is used land, and can't be modified for anything - a dead, pretty nasty lane with nothing on it isn't a something I see people using.	No change proposed. The proposed modifications relating to the updated location of portions of the Old Oak Major Town Centre are considered to be justified and effective. Policy SP6 defines the proposed town centre hierarchy. The Local Plan and proposed modifications are clear in the distinction between the Old Oak Major Town Centre and North Acton Neighbourhood Town Centre. Further guidance is provided for portions of the major town centre within the Places Chapter. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.	N	
20	Local Resident	Chris	Peyton_2		22		Transport				HS2, this week, have announced a 'Green park' outside the Old Oak station; This isn't the town centre / Old Oak Street you appear to be promoting in the plan. If HS2 are making plans and not informing you, or making plans that make your plans obsolete, it seems silly to make your plans if you have no control of the what they do, if they affect you, given the influence they currently wielding, and their 'make it up as they go along' attitude.	No change proposed. OPDC has worked closely with HS2 on the proposed public open space adjacent to Old Oak Common Station, which will form a core part of the Local Park identified for Old Oak South place within the Local Plan. Town Centres uses will be delivered alongside the Local Park on adjacent development sites.	N	

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20	Local Resident	Chris	Peyton_2		23		Environment and Utilities		EU1		You refer to the Scrubs as a playing field; it is way more than that and should be considered as such. Better people can and will fill in the details, but it a wild space (biggest in London), woodland, RC aircraft field (only one in London) home to the Thames Valley Harriers, amongst others.	No change proposed. Wormwood Scrubs is recognised for the variety of functions it provides, including as playing fields and its other recreational and ecological functions.	N	
20	Local Resident	Chris	Peyton_2		24		Housing				The proposal doesn't cater to the real need for homes in the area; Data from Ealing shows that affordable family homes make up the majority of demand, not expensive flats, nor built to rent flats. Im sure developers want to build expensive pads in skyscrapers or retain ownership for their portfolios but this doesn't resolve the actual demand at all. I see from the Mitre Yard plan you are building a grand total of 16 affordable family homes out of a total of 241 homes - insane!	No change proposed. The Local Plan provides for a full range of housing types, including Policy H2 which provides a strategic target for 50% affordable housing. Policy H3 states that developments should provide 3 or more bedrooms within 25% of all new homes and provide social/affordable rent homes in a mix of sizes in accordance with the most up-to date SHMA.	N	
20	Local Resident	Chris	Peyton_2		25		General	Community cohesion and character			Siloed, resident only facilities create splits in the community; Its 'us' and 'them' and this is across blocks or previous residents and new residents; There is no need to mix with these silos in place, creating no communities. You only have to looks at the disaster of how this played out in post-war housing blocks - no community, ultimately creating slums. This is currently playing out with many new developments with their 'poor doors' and facilities only for certain residents (Perspex Swimming pools...) its a terrible idea.	No change proposed. Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for the local community. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
20	Local Resident	Chris	Peyton_2		26		Town Centre and Community Uses				If the current biggest area of development in the area is anything to go by (North Acton), its impossible to hold developers to account for their promises. Every block has additional 5-20 floors added post planning; The retail units aren't filled; The promises for surgeries, and demand driven shops a/ facilities / infrastructure aren't for filed; Deveoplrs build and run.	No change proposed. OPDC's Local Plan continues to provides guidance for the location of town centre land uses to establish the North Acton Neighbourhood Town Centre. Aside from accommodating the Use Class Order changes, Policies P7 and P7C1 relating to town centre uses remain as per the Submission Local Plan. Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.	N	

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20	Local Resident	Chris	Peyton_2		27		Delivery and Implementation				<p>You can build, approve planning, but it doesn't resolve the infrastructure problems. See North Acton. A dump (I'm a former resident) - we got a horrid square, that was overdue by years; Nasty wind tunnel effect tats devoid of sunlight; Broken promises over surgeries and retail; And dead retail space. Its a disaster. This type of development is no good for anyone (except developers).</p> <p>No real plan for infrastructure - lots of hand waving, that clearly isnt from someone who knows the area. You intend to build 25,000 homes - so thats, say 75,000 people(?), plus all the extra travellers from the HS2 station; Yet no where to go, or to move about. The roads in the area aren't currently fit for purpose; You can't widen them for additional bike lanes, nor expand the pavement for the additional pedestrians.</p> <p>I would argue you need to nail the infrastructure, long before deciding where homes and retail would fit into the plan; This isn't the case here.</p>	<p>No change proposed.</p> <p>The Local Plan and Infrastructure Delivery Plan (IDP) set out the infrastructure required to support development anticipated within the plan period. This includes projects which will deliver a series of new and enhanced connections across the area, delivering in advance of alongside development it is required to support.</p>	N	
20	Local Resident	Chris	Peyton_2		28		Delivery and Implementation				<p>So much your plan is reliant of HS2, and what they intend to do; Clearly, that is being made up as they go along (by their own admission) - I don't see how you can make a meaningful plan on such a moving target, especially when its so early in their project.</p> <p>HS2 is a sliding timeline, every year it is delayed further; We are now up to 2033, for a limited service (3 trains and hour!) it would be sensible to assume this will slip more, its not happening by 2026 as originally promised, thats for sure.</p> <p>I would argue you need to nail the infrastructure, long before deciding where homes and retail would fit into the plan; This isn't the case here.</p> <p>I hope this proves food for thought and promotes the idea that we need a better plan, for the benefit of the plan.</p>	<p>No change proposed.</p> <p>The latest published timescales for the opening of the Old Oak Common Station are 2029-33.</p> <p>Old Oak Common Station is the key catalyst for regeneration of the OPDC area, and OPDC has planned positively for the impact of its opening. OPDC have developed the Local Plan in the context of the most of up to date projections for delivery of Old Oak Common Station, and consider that the plan allows sufficient flexibility in the case of delays to timelines for delivery.</p>	N	

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21	Politician	Cllr Pat	Healy		1		General	Consultation			<p>As a councillor for Dalgarno ward on the north-west boundary of the Royal Borough of Kensington and Chelsea, I wish to object to the latest version of the OPDC local plan. The much valued open space of Little Wormwood Scrubs lies immediately north of the ward boundary. It is owned by LB Hammersmith & Fulham, but is overseen and managed by RBKC under an agreement with LBHF.</p> <p>My constituents have been broadly aware of the OPDC Local Plan since preparation of it began in 2016. Five years on, only a small minority of residents have managed to keep up with the sequence of events on this much delayed Plan.</p> <p>As a ward councillor, I try to keep up with planning issues affecting the ward. The OPDC consultation letter circulated to households in the area stated that 'much of our Draft Local Plan hasn't changed'.</p> <p>I was aware that the earlier proposals for 'Old Oak Park' on the Cargiant site were no longer alive. But I was not aware until recently that wholly new plans for high density housing at 'North Pole Depot' had been added by OPDC as a late stage 'modification' to the Local Plan.</p> <p>Nor was I aware that there will now be no way of accessing the Old Oak Common Station by bus, car, or taxi from North Kensington. A proposed Crossrail station at Portobello North/Kensal Canalside is very unlikely to happen.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified for a high density residential area, albeit outside of the Local Plan period and its phasing has now been brought forward.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Scrubs Lane will be within a 15 minute walk of Old Oak Common Station and served by new and enhanced bus routes connecting the area to Harlesden, White City, Old Oak Common Station, North Acton and Park Royal. OPDC's Bus Strategy Update developed by TfL defines these bus routes.</p> <p>Proposed modifications to new and improved east-west walking and cycling routes are set out connecting Scrubs Lane to Old Oak North, Old Oak Common Station, Old Oak North, Old Oak Common Lane.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
21	Politician	Cllr Pat	Healy		2		Places		P10		<p>Dalgarno ward has very poor access to public transport, by inner London standards, and this now seems unlikely to change. Every day traffic exiting North Pole Road causes long delays and congestion, and so far as I can see the OPDC Local Plan will worsen rather than improve this situation.</p>	<p>No change proposed. OPDC's Bus Strategy proposals would provide more bus connectivity near to the Dalgarno Estate. Whilst the estate is outside our boundary, RBKC have given consideration to linking the estate to the North Pole Depot development in the Kensal SPD, which would provide better east-west walking and cycling connections and better access to existing and planned bus routes.</p>	N	

21	Politician	Cllr Pat Healy	3	General	Delay or withdraw the plan	<p>So I am not impressed by the level of OPDC consultation on this 'modified' Local Plan, or the addition of a new area of high density housing that will destroy the views from Little Wormwood Scrubs. This open space has become very well used during the pandemic and its popularity shows no sign of waning. Residents of the Peabody and Sutton estates north of Dalgarno Gardens value highly the qualities of this public park and the fact that it is not surrounded by tall buildings on all sides. Little Wormwood Scrubs has also become a refuge for survivors and bereaved from the Grenfell tragedy.</p> <p>For all these reasons I trust the plan will be modified again both for the sake of improving local traffic and resiling from the idea that high density housing is needed here.</p>	<p>No change proposed</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. These reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. 	N
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												<ul style="list-style-type: none"> • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		
22	Local Resident	Daniela	Geatti		1		General	Support for community group comments			I ms daniela geatti support the views of the St Quintin and Woodlands Neighbourhood Forum	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments	N	
23	Local Resident	Dariusz	Dzwigaj		1		Strategic Policies		SP6		I believe the Modified Local Plan should not be implemented in its current form for the following reasons: 1. The OPDC's 2021 Draft Local Plan designates the Channel Gate site for 'major town centre uses' with high density housing and high-rise buildings. The planning document states that together with North Acton, both high-rise clusters will form a part of a 'town centre'. High-rise / high density development at Channel Gate site will be totally out of place if located next to the existing 2-storey Victorian cottages of Island Triangle. Also, both areas are quite far apart, so they will never form one 'town centre'.	<p>No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p>	N	
23	Local Resident	Dariusz	Dzwigaj		2		Places		P9		I believe the Modified Local Plan should not be implemented in its current form for the following reasons: 2. A4000 is one of the most congested roads in West London. Since HS2 works started, the build-up of traffic paralyses the area for hours every day. Adding another high-density development here will only make it worse. In addition, Channel Gate area has only has only one access road which joins Old Oak Lane, so traffic on exit into the A4000 would be at standstill most of the day.	<p>No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel.</p> <p>The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site.</p>	N	

23	Local Resident	Dariusz	Dzwigaj	3	General	Extent of changes	<p>I believe the Modified Local Plan should not be implemented in its current form for the following reasons:</p> <p>3. Face to face meetings were not possible in the pandemic and OPDC only offered very limited online sessions. Meanwhile, OPDC adopted a radical change to its local plan – moving housing from the failed Car Giant site concept to new sites by existing homes, effectively hiding its plans from the local people.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phonenumber, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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23	Local Resident	Dariusz	Dzwigaj		4		Places		P9		In different places, this plan's numbers for Channel Gate are awry: Policy P9 refers to 3,100 homes being planned for the area and Policy P8 2,750 homes over the plan's period - which suggests the indecent haste with which this idea has been advanced. This policy represents over-development of one site and should be reconsidered and it certainly needs much more detailed public consultation.	<p>No change proposed.</p> <p>Policy P9 identifies the Channel Gate place as having the capacity for 3,100 new homes.</p> <p>Policy P8 identifies the Old Oak Lane and Old Oak Common Lane as having the capacity for 2,750 new homes.</p>	N	

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23	Local Resident	Dariusz	Dzwigaj		5		Strategic Policies		SP9		<p>I believe the Modified Local Plan should not be implemented in its current form for the following reasons:</p> <p>4. The OPDC's assumption through the draft plan that high rise offices and housing is the basis of future communities is highly questionable – all the more so because the issue of safe cladding of tall buildings after the Grenfell disaster still hasn't been sorted out and, post pandemic, the fact that much of the workforce wants to stay working at home or in smaller community resources, rather than high-rise, town centre offices. For example, ONS data from early in the pandemic suggest that more than half of Londoners had done some work at home and in 2021 its research showed that 85% of employees want to retain some form of hybrid or remote working.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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23	Local Resident	Dariusz	Dzwigaj		6		Strategic Policies		SP9		<p>I believe the Modified Local Plan should not be implemented in its current form for the following reasons:</p> <p>5. Throughout the document, there is an underlying assumption that developments like Channel Gate or Victoria Road will have "tall buildings", which is the OPDC's euphemism for 40, 50 & 60 storey high, effectively vague and too secretive to say it openly in the documentation for each of the development sites. The documentation also proposes having buildings of 6-10 storeys at the margins of these development sites, which a normal member of the public would regard as a "tall building". For example, Chapter 4 on Channel Gate proposes having buildings of -10 storeys fronting the Grand Union Canal at Channel Gate.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. OPDC' Tall Buildings Statement defines a tall building as above 15 storeys.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p>	N	
23	Local Resident	Dariusz	Dzwigaj		7		Places		P3		<p>Having buildings of 8-10 storeys will fundamentally change the character of the Grand Union Canal for ever. This proposal does not align in any case with the draft plan's policy Chapter 4 (4.49), which proposes widening the canal in an attempt at "conserving and enhancing the character of the canal". Having such tall buildings along the Grand Union Canal will overwhelm the existing two-storey high Old Oak Lane Conservation Area.</p>	<p>No change proposed. The Grand Union Canal Massing and Enclosure Statement Update continues to recommend delivering generally 6 to 8 storeys along the Grand Union Canal. This is stated in Policy P3. The proposed modifications did not amend this part of the Local Plan. OPDC considers this is justified and sound.</p>	N	
23	Local Resident	Dariusz	Dzwigaj		8		Strategic Policies		SP9		<p>I believe the Modified Local Plan should not be implemented in its current form for the following reasons:</p> <p>6. The plan's obsession with high rise and high density building also permeates Policy 7 for North Acton and Acton Wells which proposes "tall buildings across North Acton and Acton Wells in appropriate locations in accordance with policies SP9, D54" - "generally 10 to 12 storeys along Victoria Road north of Old Oak Street," P7, 3.15 within Acton Wells East, "generally 10 to 12 storeys along Victoria Road north of Old Oak Street". Given that 10-12 storeys is the plan's benchmark for building heights at the edge of this area, existing residential areas will simply be overwhelmed and ruined by these much higher buildings in Old Oak. The plan's proposal for "generally lower heights adjacent to sensitive locations including "Wells House Road, Midland Terrace and along Jenner Avenue" is not credible either; building heights near these locations and the Island Triangle should be commensurate with them - i.e. be no more than two storeys high, so their essential and attractive Victorian/Edwardian character is retained and conserved.</p>	<p>No change proposed. The building heights policies have not been amended as part of the proposed modifications for North Acton and Acton Wells. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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23	Local Resident	Dariusz	Dzwigaj		9		Places		P8		I believe the Modified Local Plan should not be implemented in its current form for the following reasons: 7. Chapter 4.153 proposes keeping development to the height of The Collective (the ten-storey building adjacent to the Grand Union Canal), proposing that "Development of the Willesden Junction Maintenance Depot and sites to the south should reflect the existing height of The Collective in the north of the site and decrease to respond to the existing Victoria Terrace". This is vague and unfair: development adjacent to Victoria Terrace must be kept to two stories, as they are two story houses - these proposals will destroy the character of Victoria Terrace if enacted.	No change proposed. Modifications were not proposed for policy P8C1(g) . OPDC considers the policy is sound and justified reflecting wider building heights guidance in policy P3 for canalside locations.	N	
23	Local Resident	Dariusz	Dzwigaj		10		General	Delay or withdraw the plan			Conclusion: Proposing buildings much higher than the existing ones in Old Oak will fundamentally change the amenity of existing residential areas so much, that this policy requires further consultation with local communities.	No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. Any future planning applications for tall buildings would undergo public consultation.	N	
23	Local Resident	Dariusz	Dzwigaj		11		Strategic Policies		SP9		The draft plan's obsession with high rise will destroy the character of the existing residential areas. Local people in Old Oak who have visited the redeveloped Stonebridge Park estate only one mile to the North, can see that 4-5 storey developments have created far more attractive and sustainable communities than is being proposed for Channel Gate Road and the expansion of North Acton. This is not careful strategic development - it is the OPDC making a tactical switch after failing to develop the Car Giant site. The amount of development proposed by the modified Local Plan for Channel Gate and North Acton is not sustainable. Building at such heights and density will dominate and degrade the existing low-rise residential areas.	No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies. The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	

23	Local Resident	Dariusz	Dzwigaj		12		General	Extent of changes			<p>This proposal has been inadequately consulted on and should not be introduced as a 'modification' at this very late stage of the plan's development.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
24	Community / interest group	Dave	Hucker	Friends of Little Wormwood Scrubs	1		General	Extent of changes			<p>I am writing to object to the latest modifications to your Local Plan for this area. My name is Anna Horsbrugh-Porter and I am a local resident in W10, living close to Scrubs Lane. I am also Secretary of the Friends of Little Wormwood Scrubs Park.</p> <p>My main points of opposition to the Modified Local Plan are as follows:</p> <p>Many of the 'modifications' to the Draft Local Plan are significant changes. We were not fully informed of these in the consultation letter you sent out in May of this year. That letter was misleading as the modifications proposes changes that will affect the local communities lives in a dramatic way. The consultation you have run is therefore inadequate.</p>	<p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p> <p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
24	Community / interest group	Dave	Hucker	Friends of Little Wormwood Scrubs	2		Places		P10C5		<p>In particular, the proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan and cannot be treated as a minor modification.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

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24	Community / interest group	Dave	Hucker	Friends of Little Wormwood Scrubs	3	MM/PS2/OPDC/P10C5/1	Places		P10C5		<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. This modification will destroy the views from our local open spaces - Wormwood Scrubs and Little Wormwood Scrubs. These skylines are part of the very essence of this 'common land' and are vital for our local communities, many of whom live in large housing estates in one of the most densely populated and deprived areas of the country.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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24	Community / interest group	Dave	Hucker	Friends of Little Wormwood Scrubs	4	MM/PS2/OPDC/P2/1	Places		P10		<p>The lack of transport of improved road systems undermines the proposals for the proposed new developments. With no new overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
24	Community / interest group	Dave	Hucker	Friends of Little Wormwood Scrubs	5		Places		P1		<p>There is no vehicle access from Scrubs Lane to the eastern end of the new Old Oak station. Without improvements, traffic issues will get worse. Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane sees longer queues every year. Why is a new Local Plan not dealing with this issue?</p>	<p>No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in it's own right, similar to Kings Cross. OPDC's aspirations for Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area. The station has been designed with the western entrance being the main station entrance, meeting all health and safety, including fire, regulations.</p>	N	

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24	Community / interest group	Dave	Hucker	Friends of Little Wormwood Scrubs	6		General	Delay or withdraw the plan			<p>The Modified Local Plan highlights how out of date the Local Plan has become. There is little evidence that there is an appetite for high-density living, following Grenfell, Covid and social trends. Now is the time to step back and review the plan, not force through significant changes under the guise of 'modifications'. Make it a plan that reflects our future rather than one that becomes an empty symbol of the past.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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25	Local Resident	David	Marshall		1		General	Support for community group comments			I support the representations made by the St Quintin Forum in respect of the draft local plan of the OPDC.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	1		General	General			The Department looks forward to continued dialogue with OPDC as the Local Plan progresses towards adoption. 1 Context The Secretary of State for Transport is a landowner of a number of sites within the Old Oak Common and Park Royal ("OPDC") Opportunity Area, including worksites currently occupied by the HS2 project, which will remain within the ownership of Secretary of State once the required works to the Old Oak Common Station and railway are complete. The Secretary of State's interests extend to land currently under the control and occupation of other public sector bodies including Network Rail and HS2 Ltd. The Department's land ownings within the OPDC boundary is extensive and is not limited to the sites referred to within the representations set out within this letter. The representations contained herewith focus on the following sites, however there are other areas of opportunity within the OPDC boundary that have not yet been fully explored. - North Pole East Depot - Channel Gate - Adjacent Site Development ('ASD') - Acton Wells and Acton East In providing a formal representation to the proposed modifications, the Department has sought to provide a coordinated response which reflects the strategic requirements of all the Transport Bodies. The Department has an obligation to achieve best consideration and to maximise returns for the public purse. These representations provided within this letter on behalf of the transport bodies therefore considers this strategic requirement.	Noted.	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	2		Strategic Policies	SP10			The OPDC and the Department have previously engaged on the drafting of the Local Plan, specifically the inclusion of policies affecting the site at North Pole East. The Department is satisfied that the modifications agreed under the Statement of Common Ground ('SoCG') dated February 2021, namely the quantum of permissible residential and commercial development, as well as inclusion of new access between East and West of the site, have been effectively incorporated and thus the proposed modifications regarding this site are supported.	Noted.	N	

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26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	3		Strategic Policies		SP10		<p>HS2 Ltd is currently in occupation of four sites, which are used as worksites for the HS2 construction. HS2 Ltd previously agreed the Statement of Common Ground, in respect of the Adjacent Site development ("ASD"); Channel Gate and Acton Wells East and West. Network Rail also agreed a Statement of Common Ground which supports the allocation of the Channel Gate site for residential development (Site 26) and the wider support and promotion for increasing housing supply in the wider OPDC area. The Department was not consulted. The Department recognises that the proposed changes will help promote the Old Oak Common area as a new commercial and residential destination and is thus supported.</p> <p>The Department is supportive of the overarching changes with regards to the HS2 work sites, including the key diagrams which show the primary modifications in terms of land use. It is noted that the operational requirements of HS2 have been taken into account in considering the development potential and capacity of the sites. In particular, the Department is supportive of the designation of the area around HS2 Old Oak Common Station, which will include HS2's ASD site, as a 'Major Town Centre/ Commercial Centre'. This reflects the Department's desire to maximise this site for commercial development due to its proximity to the future and existing stations. The Department therefore welcomes the description of this area within the summary of proposed changes, in particular the reference to "new job opportunities on the doorstep" in relation to the station, as this further emphasises the role of this area in providing commercial and employment floorspace.</p> <p>The Department is therefore satisfied that the overarching principles are in line with Statements of Common Ground (SoCG) agreed between OPDC and Network Rail and HS2 Ltd.</p>	Noted.	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	4		Strategic Policies		SP10		<p>An overarching principal which guides these representations is the Department's requirement to aim to maximise returns for the public purse in its commercial endeavours, including through its commercial real estate interests. It also recognises that the planned redevelopment of the OPDC area has had to evolve in response to the loss of the Cargiant site and adjacent sites at Old Oak North. As a result, the Department has sought to pursue open and collaborative dialogue with OPDC to maximise the potential of its sites within this context.</p>	Noted.	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	5		Strategic Policies		SP10		<p>An additional overarching principle of the Department's position is the need for flexibility with respect to development quanta (while recognising the need to meet minimum housing and non-residential thresholds) and the form, layout, and spatial configuration of development on each site. This flexibility will enable future developers to apply their placemaking and commercial requirements in accordance with the Local Plan.</p>	Noted. Please refer to OPDC's responses to DfT's detailed comments.	N	

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26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	6		Strategic Policies		SP10		<p>2 Optimising Housing</p> <p>The Government published its report Fixing our Broken Housing Market (2017) which sought to make more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land. The National Planning Policy Framework 2019 ("NPPF") sets out policies to support the Government's objective of significantly boosting the supply of homes. It also establishes clear policy objectives to optimise surplus brownfield land in accessible locations and gives substantial weight and support to the development of under-utilised land and buildings where this would meet identified needs for housing.</p> <p>More recently in March 2020, prior to the adoption of the London Plan, the Secretary of State for Housing, Communities and Local Government ("MHCLG") wrote to the Mayor of London asking him to make modifications to the London Plan. The Secretary of State HCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land.</p> <p>The Secretary of State Secretary of State for Housing, Communities and Local Government directed the Mayor of London to optimise density. Specifically, the Secretary of State HCLG stated that it is important that development is brought forward to maximise site capacity, in the spirit of and to compliment the surrounding area, not to its detriment. Sites cannot be looked at in isolation and Londoners need to be given the confidence that high density developments will be directed to the most appropriate sites, maximising density. The Secretary of State HCLG directed the Mayor of London to ensure that such developments are consented in areas that are able to accommodate them. In committing to maximise delivery in London, the Secretary of State HCLG advised the Mayor of London that this must include actively encouraging appropriate density, including optimising new capacity.</p> <p>The August 2020 White Paper: Planning for the Future White Paper maintains the Government's policy approach by seeking to make better use of surplus land owned by the public sector to help fix our planning system.</p>	Noted. OPDC considers that the proposed modifications support an optimised and deliverable approach to the public sector land holdings within the OPDC area.	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	7		Transport		T4		<p>3 Safeguarding</p> <p>With regard to safeguarding, the Plan makes specific reference to implications arising from the safeguarding zone designation around RAF Northolt. There does not appear to be an equivalent reference to the formal HS2 Phase One Safeguarding Directions by the Secretary of State to Transport for the area within Old Oak and Park Royal.</p> <p>In order to protect the planned railway route from conflicting development, the Secretary of State safeguarded the London to West Midlands route (Phase One) of HS2 using Safeguarding Directions, which are an established tool of the planning system designed for this purpose. Safeguarding aims to ensure that new developments do not impact on the ability to build or operate HS2 or lead to excessive additional costs. It is requested that this is reflected within the Local Plan.</p>	Change proposed. The Policies map is proposed to be modified to depict the HS2 safeguarding as defined by HS2 Phase One Safeguarding Directions.	Y	26/7

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26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	8		Design		D4		<p>4 Tall Buildings</p> <p>The Department supports the Plan's policy D4 Tall Buildings paragraph 5.40 which defines tall buildings as those above 15 storeys or 48 metres above ground level. It is important that this localised tall building definition is retained as it is integral to all other policies within the Local Plan. If the definition is revised to reflect London Plan Policy D9 (A) then this would undermine growth policies within the Plan.</p> <p>It is also important, when considering conformity with London Plan D9(B) that the relevant site allocations recognise that the Department sites are appropriate for tall buildings when applying the seven storey definition set out in London Plan Policy D9(A). This is a requirement of Policy D9(B), and the Department would welcome explicit recognition of this.</p>	<p>Noted. OPDC considers the proposed modifications relating to tall buildings to be in general conformity with the 2021 London Plan. OPDC's Tall Building Statement Update continues to identify a tall building as above 15 storeys or above a minimum of 48 metres above ground level in relation to London Plan policy D9(A). The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>OPDC's Local Plan definition for tall buildings would supersede the London Plan 2021 definition once adopted and it is therefore not considered appropriate or effective to make mention of the London Plan definition within OPDC's Local Plan.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	9	Places	P10C5	<p>5 Site Specific Changes: North Pole East Depot</p> <p>The Department has engaged with the OPDC since 2019 in respect of North Pole East Depot. North Pole East Depot is brownfield land used for transport purposes. It is expected that the Department will not require it for transport uses during the Plan period, therefore the Department has engaged with OPDC to plan for its optimal use, which is housing.</p> <p>The Department completed a Statement of Common Ground with the OPDC on 15th February 2021 to inform the Plan, and now take the opportunity to comment further. The Department has undertaken an evidenced based approach to discussions with OPDC to inform the Plan and its policies regarding North Pole East. The Department confirms its support for the following aspects of the Plan.</p> <ul style="list-style-type: none"> • Figure 3.17 Site Allocations: The Department welcomes the allocation of North Pole East as Site Allocation no.40. • Policy SP10 Integrated Delivery Table 3.1 Site Allocation 40: The Department welcomes the allocation of North Pole East for a minimum of 750 homes; 500m² commercial floorspace and 40 new jobs. This allocation reflects the Statement of Common Ground dated February 2021, and the evidence base submitted to OPDC during discussions since 2019. • Policy P10C5 Mitre Way Cluster: The Department support the allocation of a residential-led neighbourhood centred on Wormwood Scrubs Street and support the allocation of a tall building on the North Pole East site subject to our comments below. The Department intends to bring forward the North Pole East Depot site for development in a holistic and coordinated approach, and seeks that the Local Plan modifications enable this, rather than the site being divided along LPA boundaries. Furthermore, The Department would like to see further amendments in respect of Policy P10 Scrubs Lane, P10C5 Mitre Way Cluster which identifies North Pole East as a site within the Mitre Way Cluster. P10C5(j) seeks the contribution to a variety of building heights including locating a single tall building on the North Pole East Depot at the junction of Mitre Way and Wormwood Scrubs Street. Supporting paragraph 4.219 states that delivering a single tall building at the junction of Mitre Way and Wormwood Scrubs Street is considered to be appropriate in principle, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to the new east-west connection to Kensal Canalside in the short- to medium-term and to Old Oak Common Station in the longer-term. <p>Whilst the Department does not disagree with this policy approach, and it is recognised that the OPDC defines tall buildings as those above 15 storeys or 48 metres above ground level, the Department does consider that the Mitre Way Cluster could be extended further east along Wormwood Scrubs Street to tie into the emerging development proposed within the Kensal Canalside Opportunity Area SPD (“KCOA SPD”) on land owned by the Department. Extensive modelling of development heights has indicated that up to 20 storeys may be appropriate between the railway line and Little Wormwood Scrubs within the KCOA boundary. Currently, there would therefore be inconsistency between Policy P10C5 and the KCOA SPD which the Department would like to see resolved.</p> <p>Due to the relationship with the KCOA SPD, and the very long length of the development site that extends across OPDC and KCOA (just under 1.5km), the Department considers that a second tall building on the North Pole East Depot adjacent to Little Wormwood Scrubs is considered to be appropriate in principle, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to the new east-west connection to Kensal Canalside in the short- to medium-term.</p> <p>It is also important, when considering conformity with London Plan D9(B) that Policy P10C5 recognises that the whole of North Pole East is appropriate for tall buildings when applying the definition set out in London Plan Policy D9(A).</p>	<p>No change proposed.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles (SLDFP). OPDC considers the proposed location and extent of the Mitre Way Cluster reflects the principles set out in the SLDFP. Expanding the cluster and/or identifying a second tall building location would not be justified or consistent with the SLDFP</p> <p>OPDC considers the approach set out in proposed modifications is consistent with the guidance set out in RBKC’s Local Plan and Kensal Canalside Supplementary Planning Document. RBKC supports the proposed modifications to deliver this coordinated approach. See comments 105/2 and 105/3.</p> <p>OPDC will continue to work with DfT and RBKC in optimising the development of the site and coordinating the approach to development across local planning authority boundaries.</p>	N
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26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	10		Places		P9		<p>6 Site Specific Changes – Channel Gate</p> <p>The Department is supportive of the release of Channel Gate from strategic industrial land and the description of Channel Gate as an area for housing-led mixed-use development. Within the Modified Draft Local Plan, the Department is supportive of the allocation for Channel Gate contained within Table 3.1 – Site Allocations, which allocates 3,100 homes and 10,700 sqm of commercial floorspace on the site over the plan period. These totals are in line with Statement of Common Ground (SoCG) agreed between OPDC and HS2 in December 2020.</p> <p>Generally, the Department is supportive of policies which provide maximum flexibility and scope for a range of different development configurations, to come forward as part of future design stages. This is because greater flexibility within the Local Plan will help to ensure that HS2 Ltd is better able to meet its requirements to provide maximum value for the public purse on behalf of the Secretary of State and the future developer will be well placed to maximise the potential of the site in delivering jobs and homes. Regarding open space, it is noted that Policy P9 – Channel Gate requires a local park of at least 2ha at Channel Gate, with the policy’s supporting text stating that this park should be “located either side of the Grand Union Canal”. This policy is linked to Policy P3 – Grand Union Canal, which requires that the Channel Gate Local Park should be located along the canal, including the provision of moorings.</p> <p>As outlined above, one of the overarching principles that the Department supports throughout the Local Plan is maximising flexibility in how the objectives of the Local Plan are achieved. For this reason, the Department proposes that additional flexibility be introduced with respect to the location and form of the Channel Gate Local Park. At present, the Department considers that the specific requirements for the park to front onto and straddle the Grand Union Canal contained within policies P3 and P9 are overly prescriptive and should not be fixed to this degree at this stage. As part of the detailed future design of the overall site, the Department will all need to consider a range of factors including public amenity, placemaking, land ownership and development viability. Options for the location of the park would be considered in greater detail at this stage, to ensure that high quality open space is provided while also maximising the development potential of the site in line with the Department’s requirement for its element of the Channel Gate site.</p> <p>For these reasons, the Department would welcome the removal of place specific requirements for the Channel Gate Park to be located along the canal front, and instead would welcome greater flexibility which sets out that a 2ha local park will be provided on the site, with the location subject to more detailed design development at future planning stages.</p>	<p>No change proposed. To ensure a high quality place, and to deliver the other principles for Channel Gate Place as set out Policy P9 and the Channel Gate Development Framework Principles , OPDC consider that a Local Park should front onto the Grand Union Canal. A significant degree of flexibility exists with regards to the general alignment and location of the park itself, and the policy approach does not preclude a significant majority of the park being delivered on one side of the canal. The new Local Park will need to be delivered in line with requirements to Policy EU1 (Open Space) to ensure high quality new space.</p>	N	

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26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	11		Places		P9		<p>With respect to building heights, the Department also notes that indicative heights are provided within Policy P9 for areas along Victoria Road and the Grand Union Canal. Similar to our comments regarding the provision of the Channel Gate park, this is another area where the Department would welcome increased flexibility rather than including any specific building heights, even if indicative. The Department would instead propose a wider 'catch-all' wording, which states that a range of building heights will be permissible, including tall buildings where appropriate, subject to more detailed design considerations in future. This approach would be in accordance with the London Plan.</p>	<p>No change proposed.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>A flexible approach to building heights applies to a significant majority of the Channel Gate site, and general height guidance has only been provided for areas adjacent to sensitive locations.</p> <p>Height guidance adjacent to Victoria Road is in place to protect the amenity of the Midland Terrace and Shaftsbury Gardens residential community. Height guidance adjacent to the Island Triangle residential area (Old Oak Lane Conservation Area) is in place to protect amenity of the area and the setting and character of the conservation area.</p> <p>Policy guidance for heights along the length of the Grand Union Canal is evidenced by the Grand Union Canal Massing and Enclosure Statement (Update). The study demonstrates that, generally, heights of 6 to 8 storeys should be delivered adjacent to the canal to provide an appropriate sense of enclosure to the canal and Canalside spaces. The potential for tall buildings at appropriate locations along the canal is recognised at crossings of key routes and subject to site specific considerations.</p> <p>The Local Plan depicts the areas within Channel Gate which are considered to be appropriate for tall buildings, in line with London Plan Policy D9 and the associated December 2020 ministerial direction on the London Plan.</p>	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	12		Places		P9		<p>It should be noted that there is further land adjacent to the Channel Gate allocation that will be available for development in the future. Further work needs to be undertaken to fully understand the development potential of this land. The Department supports Paragraph 8.9 of the plan that welcomes windfall developments in addition to allocated sites that will increase the overall supply of housing during the plan period.</p>	<p>Noted. Further mixed use development of this land would be supported subject to other planning policy requirements being appropriately met and OPDC has de-designated this land from Strategic Industrial Location accordingly.</p>	N	

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26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	13		Places		P1		<p>7 Site Specific Changes – Old Oak Common Station Surroundings (also known as the Adjacent Site Development 'ASD' Site)</p> <p>As identified by OPDC, Old Oak Common Station is identified as being the focus for a significant new commercial and employment hub. This commercial hub is reflective of the site's unparalleled accessibility and connectivity both within London but also at a regional and national level. As has been demonstrated in London and in regional cities, the delivery of major new station hubs provides the opportunity to deliver significant new office and retail floorspace which will generate new jobs and future investment into the surrounding area. Kings Cross is a good example of this and shows how a well planned masterplan based around new and existing transport infrastructure can provide the catalyst for new commercial development and the creation of a new office cluster.</p> <p>The latest Deloitte Office Crane Survey (Summer 2021) shows that within the Central London office market, speculative new start developments have increased which shows a confidence in the office market despite any perceived set back caused by the pandemic. Whilst home working will have an impact on office demand, it is identified that this will be sector dependent and that the use and purpose of office space is likely to change to reflect a hybrid working model. The majority of developers are looking to increase their pipelines in the next six months focusing on prime and best in class office space.</p> <p>Therefore, the Department is supportive of the allocation within Table 3.1 of the Modified Draft Local Plan for a minimum of 100 homes and 250,000 sqm of commercial floorspace at the site. This is in accordance with the quanta agreed within the SoCG agreed in December 2020 and reflects the Department's aspirations for this site to act as a key commercial and employment centre which capitalises upon its proximity to the future HS2 Old Oak Common Station.</p> <p>The timeline for the delivery of the commercial space is over the plan period and there are likely to be changes to the requirements of retail and office occupiers during this time. The Department notes the change to Policy P1 – Old Oak South part d) to reflect the change from use class B1 to use class E, and the Department welcomes the broader range of uses that this would support as this will provide additional flexibility to accommodate need over time.</p>	Noted.	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	14		Places		P7		<p>8 Site Specific Changes – Acton Wells East and Acton Wells West</p> <p>The Department is supportive of the designation of Acton Wells East (also known as the Shield Site) and Acton Wells West (also known as the Victoria Road Box Site) as suitable for mixed-use development. The Department notes that Table 3.1 of the Modified Draft Local Plan sets out that a minimum quantum of 1,650 homes and 8,000 sqm of commercial floorspace are proposed for Acton Wells East, while 555 homes and 30,000 sqm of commercial floorspace are proposed for Acton Wells West. These figures are mostly in accordance with the SoCG agreed in December 2020 and are therefore supported, noting in particular that these quanta are minimum targets subject to future flexibility through design. The Department notes that the proposed minimum quantum of 555 homes at Acton Wells West is slightly higher than the 550 home minimum agreed in the SoCG; however, the revised figure of 555 is supported.</p>	Noted.	N	

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26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	15		Places		P7		Regarding building heights, the Department also notes that indicative heights of 10 to 12 storeys are provided within Policy P7 – North Acton and Acton Wells for areas along Victoria Road north of Old Oak Street. In line with our previous comments, the Department welcomes greater flexibility with respect to building heights across all policies relating to HS2 works sites, to ensure that future opportunities are not constrained.	No change proposed. This policy requirement is considered to still be justified through the Victoria Road and Old Oak Lane Development Framework Principles supporting study and is not proposed to be modified.	N	
26	Land owner	Kate	Douglas	Department for Transport, HS2 Ltd and Network Rail	16		Strategic Policies		SP10		<p>9 Conclusion</p> <p>The Department is grateful for having the opportunity to provide comments as part of this consultation and would be grateful for confirmation of receipt of these representations.</p> <p>The Department considers that a consolidated and holistic approach is required in order to successfully bring the OPDC area forward for development. The Department has therefore sought to provide a co-ordinated response to the OPDC Local Plan modifications on behalf of the Transport Bodies in respect of the land owned by the Department within the OPDC boundary and which is subject to modifications. The Department considers that the proposed modifications are largely reflective of the SoCGs agreed between OPDC and the Transport Bodies in respect of sites within the OPDC Local Plan boundary. The proposed allocation towards mixed use, residential led development is also supported given the change in emphasis towards land immediately around the Old Oak Station site.</p> <p>The Department recognises the reasons and rationale behind why the proposed modifications have been necessary, and are pleased to have engaged positively with OPDC over a number of months to agree the overarching changes in land-use across HS2's four works sites, in particular Channel Gate. However, it is important to recognise the Secretary of State's requirements regarding the maximisation of returns for the public purse where possible. For this reason, the Department has outlined a number of comments which seek to promote increased flexibility within the Local Plan, in particular in relation to the location of the Channel Gate local park and the way in which this is set out within the modifications, and in relation to indicative building heights where these are stated. The Department is committed to facilitating high-quality development at HS2's worksites that achieve the overarching objectives of the Local Plan, however at this stage in the planning process, the Department would welcome as much flexibility as possible to allow for the consideration of a wide range of design options at future stages of planning.</p> <p>The Department looks forward to continuing to work with OPDC to bring forward these sites for development and to contribute towards the vision and objectives of the Local Plan.</p>	<p>Noted. OPDC looks forward to working with the Department for Transport, HS2 and Network Rail in supporting the development of the OPDC area.</p> <p>Please refer to OPDC's response to DfT, HS2 and Network Rail's site specific comments.</p>	N	

27	Local Resident	Dimitrios Makromallis	1	MMPS2/OPDC/P10C5/1	Places	P10C5	<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. More residential towers are also planned for Scrubs Lane. How were we meant to hear about these latest plans? They will destroy the views from our local open spaces.</p>	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and 	N
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												<p>Get West London.</p> <ul style="list-style-type: none"> • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		

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27	Local Resident	Dimitrios	Makromallis		2	MM/PS2/OPDC/P2/1	Places		P10		<p>With no new Overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
27	Local Resident	Dimitrios	Makromallis		3		General	Support for community group comments			<p>In addition I fully support the views of the St. Quintin and Woodlands Neighbourhood Forum.</p>	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.</p>	N	

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28	Local Resident	Elaine	Chumney		1		General	Extent of changes			The Plan has changed significantly since 2018.	<p>No change proposed. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>The majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p>	N	
28	Local Resident	Elaine	Chumney		2		General	Extent of changes			<p>Consultation on these changes has been inadequate, especially on Channel Gate as a future housing site and 'major town centre'.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development. The Local Plan previously identified Atlas Junction as a neighbourhood town centre. The proposed modifications continue to identify town centre uses in Channel Gate centred around Atlas Junction as part of a modified Old Oak major town centre.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
28	Local Resident	Elaine	Chumney		3		General	Support for community group comments			The representations from the Old Oak Neighbourhood Forum are supported.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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29	Local Resident	Ellie	Worthington		1		Strategic Policies		SP9		I am a resident in The Island Triangle (TITRA) and am writing to object to the OPDC's Modified Local Plan for the following reasons: The proposal for CG Road as a high rise development is grossly out of keeping with the existing residential area of cottages, and will hem in the existing residents both physically and psychologically.	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Policy P8 for Channel Gate also requires lower heights and massing adjacent to the Island Triangle.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p>	N	
29	Local Resident	Ellie	Worthington		2		Design		D5		We are not a 'town centre' and do not wish to be so. We want to live in peace.	<p>No change proposed. Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>The Local Plan previously identified Atlas Junction as a neighbourhood town centre. The proposed modifications continue to identify town centre uses in Channel Gate centred around Atlas Junction as part of a modified Old Oak major town centre.</p>	N	
29	Local Resident	Ellie	Worthington		3		Strategic Policies		SP9		We are having to endure the constant dust and noise and disturbance from HS2; to think of extending this pain for more building works is intolerable.	<p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. These policies will be applied to development proposals. HS2's Environmental Minimum Requirements and associated undertakings and assurances were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which deal with mitigation during construction of HS2.</p>	N	
29	Local Resident	Ellie	Worthington		4		Design		D3, D4		North Acton high rise developments are horribly urban and claustrophobic.	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The proposed modifications for P7 and P7C1 relating to North Acton are limited and continue to seek high quality high density development.</p> <p>Policies in the design chapter continue to require a high quality of design of buildings and appropriate consideration to be given to the amenity of adjoining sites.</p>	N	
29	Local Resident	Ellie	Worthington		5		Strategic Policies		SP3		Why can't the site be used to create more green space for local residents to invest in public health and reduce health inequalities, rather than greedy developers making money?	<p>No change proposed.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	

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29	Local Resident	Ellie	Worthington		6		Strategic Policies		SP7		I am a resident in The Island Triangle (TITRA) and am writing to object to the OPDC's Modified Local Plan for the following reasons: There is clearly not enough access to sustain a high density population via CG Road. The traffic issues on Old Oak Lane are pretty terrible as it is in terms of pollution and parking and congestion.	No change proposed. The Local Plan includes proposals to address congestion, such as policies on reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. OPDC's sustainable transport hierarchy encourages journeys by foot, bike and public transport and adopts more restrictive car parking policies than the 2021 London Plan.	N	

29	Local Resident	Ellie	Worthington	7	General	Consultation	<p>I am a resident in The Island Triangle (TITRA) and am writing to object to the OPDC's Modified Local Plan for the following reasons: As a resident I do not feel I have been adequately consulted, and I understand that the developers have had to change their proposal late in the day due to their errors in earlier planning on the Car Giant Site. This feels underhand and uncaring to local populations.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
30	Local Resident	Emma	Henderson		1		Places		P10		I am writing to object to the proposals in the OPDC Modified Draft Local Plan that directly impact upon Little Wormwood Scrubs, valued and vital parks and green spaces for our neighbourhood.	<p>No change proposed. OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
30	Local Resident	Emma	Henderson		2		Places		P10C5		<p>Consultation by OPDC on the 'modifications' has been inadequate. Proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan. This is a significant revision to plans for the area, and not just a 'modification' and requires a great deal more research and consideration of residents' needs.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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30	Local Resident	Emma	Henderson		3		General	Delay or withdraw the plan			The HS2/Elizabeth Line station will not open for a decade. London's housing needs and travel patterns have already changed hugely due to the effects of Covid. It would be more effective to wait and do more research on what is really needed when the station opens and draw up a new and more effective Local Plan then.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
30	Local Resident	Emma	Henderson		4		Places			P10	The wide open skylines of Wormwood Scrubs and Little Wormwood Scrubs are unique in this part of west London, but the environment is being destroyed by the OPDC development. Our green spaces are being damaged beyond repair - this is the legacy you are leaving for future generations. Please take responsibility and stop this destruction now before it is too late.	<p>No change proposed. OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
31	Local Resident	Emma	McAdie		1		General	General			I am writing in response to the above plan in my capacity as a Hammersmith and Fulham resident who is also a frequent user of Wormwood Scrubs open space. I've lived in this area for over 55 years. I am a trustee/committee member of Friends of Wormwood Scrubs and this is my personal response to the plan.	Noted.	N	

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31	Local Resident	Emma	McAdie		2		Places		P12		<p>1. The exploitation of Wormwood Scrubs beyond what it can sustain.</p> <p>The plan as a whole has totally insufficient provision for open, green recreational space for so many new residents and workers, so they will have few choices other than to go to Wormwood Scrubs. Yet the OPDC seems to have made no provision whatsoever for protecting the fragile natural habitat of Wormwood Scrubs from such massively increased footfall. Wormwood Scrubs as a natural habitat will suffer terribly yet - just one example - the plan actually refers to "vegetation" as an obstacle to be cleared away to enable cyclists and walkers travelling from the north to "access" the Scrubs more easily! Presumably this means cutting down more woodland, just after HS2 have cut down a lot already?</p> <p>How is destroying vegetation in order to save some cyclists the trouble of cycling a few yards further down Scrubs Lane helping the already severely stressed species clinging to existence on Wormwood Scrubs</p>	<p>No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site.</p> <p>Policy P12 protects Wormwood Scrubs as Metropolitan Open Land and as an area of ecological value. Any proposals involving impacts on areas of ecological value would need to reprovide a net gain in biodiversity in accordance with Policy EU2. Both Policy P12 and EU2 remain largely unaltered since the submission of the Local Plan.</p> <p>Providing improved access to Wormwood Scrubs is justified to support it's role as a Metropolitan Park serving the wider West London area, and it's role as set out in the Wormwood Scrubs Act. Any proposals for such improvements would need to be undertaken in agreement with the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust.</p>	N	
31	Local Resident	Emma	McAdie		3		Places		P12		<p>The impression is given that underlying this kind of suggestion, and the plans for Wormwood Scrubs in general, is a powerful desire to exploit the green space as much as possible, using its presence to liberate developers from the obligation to allow for recreational space in their own plans and thus to cram in more buildings. The Scrubs as we know it will wither .</p>	<p>No change proposed.</p> <p>In addition to the protection and enhancement of existing green space, the Local Plan requires new development to contribute towards 30% of the developable land outside of SIL to be delivered as publicly accessible open space and a net gain in biodiversity. This includes the creation of two new Local Parks of a minimum 2 ha in size located at Channel Gate and Old Oak South.</p>	N	
31	Local Resident	Emma	McAdie		4		Strategic Policies		SP2		<p>This plan refutes all current government directives with regard to climate change and it should be completely reconsidered.</p>	<p>No change proposed.</p> <p>OPDC considers the proposed modifications to be consistent with national policy including policies relating to mitigating and adapting to climate change. The proposed modifications are considered to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p>	N	

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31	Local Resident	Emma	McAdie		5		General	Delay or withdraw the plan			If the pandemic has taught us anything it is that our relationship with nature should be rethought.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
32	Local Resident	Emma	Taylor		1		General	Extent of changes			<p>I am writing to object to the latest modifications to your Local Plan for this area. I am a local resident in W10, living close to Scrubs Lane.</p> <p>My main points of opposition to the Modified Local Plan are as follows:</p> <p>Many of the 'modifications' to the Draft Local Plan are significant changes. We were not fully informed of these in the consultation letter you sent out in May of this year. That letter was misleading as the modifications proposes changes that will affect the local communities lives in a dramatic way. The consultation you have run is therefore inadequate.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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32	Local Resident	Emma	Taylor		2		Places		P10C5		In particular, the proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan and cannot be treated as a minor modification.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

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32	Local Resident	Emma	Taylor		3	MM/PS2/OPDC/P10C5/1	Places		P10C5		<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. This modification will destroy the views from our local open spaces - Wormwood Scrubs and Little Wormwood Scrubs. These skylines are part of the very essence of this 'common land' and are vital for our local communities, many of whom live in large housing estates in one of the most densely populated and deprived areas of the country.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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32	Local Resident	Emma	Taylor		4	MM/PS2/OPDC/P2/1	Places		P10		<p>The lack of transport of improved road systems undermines the proposals for the proposed new developments. With no new overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
32	Local Resident	Emma	Taylor		5		Places		P1		<p>There is no vehicle access from Scrubs Lane to the eastern end of the new Old Oak station. Without improvements, traffic issues will get worse. Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane sees longer queues every year. Why is a new Local Plan not dealing with this issue?</p>	<p>No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in it's own right, similar to Kings Cross. OPDC's aspirations for Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area. The station has been designed with the western entrance being the main station entrance, meeting all health and safety, including fire, regulations.</p>	N	

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32	Local Resident	Emma	Taylor		6		General	Delay or withdraw the plan			<p>The Modified Local Plan highlights how out of date the Local Plan has become. There is little evidence that there is an appetite for high-density living, following Grenfell, Covid and social trends. Now is the time to step back and review the plan, not force through significant changes under the guise of 'modifications'. Make it a plan that reflects our future rather than one that becomes an empty symbol of the past.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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33	Statutory Consultee	Keira	Murphy	Environment Agency	1	MM5/PS/Q3R (page 88-91)	Environment and Utilities		EU3	e)	Thank you for alerting us to the consultation on the proposed changes to OPDC's Local Plan. We have reviewed the main modifications report and have no major concerns with the amendments. However, please note our comments below as follows: Policy EU3: Water Overall we can support the amendments. Main modification MM5/PS/Q3R (page 88-91) proposes to delete (e) undertake FRAs for schemes that meet thresholds set out in Defra and EA guidance. As the requirement for Flood Risk Assessments are set out in supporting paragraph 6.40 this is adequate. The main policy hook for the FRA requirement is paragraph 164 and footnote 50 of the National Planning Policy Framework, so that is a higher-level and more pertinent signpost than Defra and EA guidance however our advice on gov.uk will also be relevant.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	
33	Statutory Consultee	Keira	Murphy	Environment Agency	2	MM5/PS/Q3R	Environment and Utilities		EU3		There are no concerns with the other changes under this main modification as the principles remain the same that we are aiming to achieve sufficient capacity in the drainage/sewer network to accommodate future developments without adversely impacting water quality or future needs.	Noted.	N	
33	Statutory Consultee	Keira	Murphy	Environment Agency	3	MM2/PS/Q39	Environment and Utilities		EU13		Main mod MM2/PS/Q39 (page 99) proposes to delete (e) setting out the requirements prior to permission being granted of carrying out a Preliminary Risk Assessment, conceptual site model and Site Investigation Scheme. Although this has been moved to be included in supporting paragraph 6.133, our preference would have been for the requirements to have remained in the policy itself. The reason given for the main modification is to ensure the effectiveness of the plan. Preliminary Risk Assessments are a key step in helping to determine whether there are any contamination risks that warrant further investigation and also help to identify what (if any) further investigations will be required via planning conditions. Therefore it would seem to make sense and ensure effectiveness to include these in the policy as the beginning of a number of steps which now only start at 'following planning permission.' Also as previously stated these requirements help applicants and OPDC better understand the financial viability of a development proposal as the potential level of further investigation work and possible remediation can be determined at this early stage. We appreciate this is OPDC's decision and we haven't been party to the wider discussions on this, and our advice is a recommendation only.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	
33	Statutory Consultee	Keira	Murphy	Environment Agency	4		Environment and Utilities		EU13	6.133	Paragraph 6.133 currently states: <i>6.133. Where land is known or found to be contaminated, or where a sensitive use is proposed or exists, developers will be expected to assess their proposals using the eight stage process outlined in Table 6.2, including submitting a Preliminary Risk Assessment and Site Investigation Scheme as part of planning applications.</i> The need for a PRA can arise simply from suspecting the potential for land contamination from the previous uses and history of a site, so it's not always the case that it is 'known' or already registered as contaminated. We would recommend this sentence in paragraph 6.133 is altered slightly to accommodate this scenario, e.g. <i>where land is suspected, known or found to be contaminated, or where a sensitive use is proposed or exists, developments will be expected...</i> We hope our comments are helpful. If you would like to discuss this further please do not hesitate to contact me.	Change proposed. Paragraph 6.133 has been amended as suggested.	Y	33/4

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34	Local Resident	Eric Alan	Leach		1		General	Delay or withdraw the plan			I consider the March 2021 version of the Draft Plan to be unsound and if implemented will lead to an unsustainable new Old Oak. Key points include: Now is not the time to draft and agree a local Plan. We are in the middle of a pandemic with ever-changing future population trends, commuting patterns and housing needs.	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
34	Local Resident	Eric Alan	Leach		2		General	Extent of changes			I consider the March 2021 version of the Draft Plan to be unsound and if implemented will lead to an unsustainable new Old Oak. Key points include: The changes proposed to the 2018 Local Plan are major ones.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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34	Local Resident	Eric Alan	Leach		3		General	Extent of changes			I consider the March 2021 version of the Draft Plan to be unsound and if implemented will lead to an unsustainable new Old Oak. Key points include: There has been inadequate consultation on the new Channel Gate plans - with substantial changes from low rise residential to high rise residential.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
34	Local Resident	Eric Alan	Leach		4		Strategic Policies		SP7		I consider the March 2021 version of the Draft Plan to be unsound and if implemented will lead to an unsustainable new Old Oak. Key points include: The claim of 'well connected' for the proposed high density housing carries no validity. No new underground or overground stations are proposed.	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
34	Local Resident	Eric Alan	Leach		5		General	Community cohesion and character			I consider the March 2021 version of the Draft Plan to be unsound and if implemented will lead to an unsustainable new Old Oak. Key points include: Overall the plans are contrary to any desire for community cohesion and are out of character with West London.	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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35	Local Resident	Ewa	Cwirko-Godycka		1		Strategic Policies		SP6		<p>I believe the Modified Local Plan should not be implemented in its current form for the following reasons:</p> <p>1. The OPDC's 2021 Draft Local Plan designates the Channel Gate site for 'major town centre uses' with high density housing and high-rise buildings. The planning document states that together with North Acton, both high-rise clusters will form a part of a 'town centre'. High-rise / high density development at Channel Gate site will be totally out of place if located next to the existing 2-storey Victorian cottages of Island Triangle. Also, both areas are quite far apart, so they will never form one 'town centre'.</p>	<p>No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>Policy P9 and SP9 require development to respond appropriately to heritage assets such as the Old Oak Lane Conservation Area and that development should be of a lower height near to these sensitive locations.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		2		Places		P9		<p>2. A4000 is one of the most congested roads in West London. Since HS2 works started, the build-up of traffic paralyses the area for hours every day. Adding another high-density development here will only make it worse. In addition, Channel Gate area has only has only one access road which joins Old Oak Lane, so traffic on exit into the A4000 would be at standstill most of the day.</p>	<p>No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel.</p> <p>The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site.</p> <p>The Local Plan's transport chapter includes a series of planning policies which seek to promote the use of sustainable travel modes, minimise car parking levels and minimise the impacts of development on the highway network during construction.</p>	N	

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35	Local Resident	Ewa	Cwirko-Godycka		3		General	Extent of changes			3. Face to face meetings were not possible in the pandemic and OPDC only offered very limited online sessions, which were mostly talking at residents rather than consulting in its true sense. Meanwhile, OPDC adopted a radical change to its local plan – moving housing from the failed Car Giant site concept to new sites by existing homes, effectively hiding its plans from the local people.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This included 5 online consultation events involving a presentation by officers and significant time for questions and answers from attendees. This exceeded our Statement of Community Involvement requirements.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		4		Places		P9		In different places, this plan's numbers for Channel Gate are awry: Policy P9 refers to 3,100 homes being planned for the area and Policy P8 2,750 homes over the plan's period - which suggests the indecent haste with which this idea has been advanced. This policy represents over-development of one site and should be reconsidered and it certainly needs much more detailed public consultation.	<p>No change proposed.</p> <p>Policy P9 identifies the Channel Gate place as having the capacity for 3,100 new homes.</p> <p>Policy P8 identifies the Old Oak Lane and Old Oak Common Lane as having the capacity for 2,750 new homes.</p>	N	

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35	Local Resident	Ewa	Cwirko-Godycka		5		Strategic Policies		SP9		<p>4. The OPDC's assumption through the draft plan that high rise offices and housing is the basis of future communities is highly questionable – all the more so, because the issue of safe cladding of tall buildings after the Grenfell disaster still hasn't been sorted out and, post pandemic, the fact that much of the workforce wants to stay working at home or in smaller community resources, rather than high-rise, town centre offices. For example, ONS data from early in the pandemic suggest that more than half of Londoners had done some work at home and in 2021 its research showed that 85% of employees want to retain some form of hybrid or remote working. The post pandemic residential needs will differ as people now realise that they can work from home and this does not seem to have been considered at all.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		6		Strategic Policies		SP9		<p>5. Throughout the document, there is an underlying assumption that developments like Channel Gate or Victoria Road will have "tall buildings", which is the OPDC's euphemism for 40, 50 & 60 storey high, effectively vague and too secretive to say it openly in the documentation for each of the development sites. The documentation also proposes having buildings of 6-10 storeys at the margins of these development sites, which a normal member of the public would regard as a "tall building". For example, Chapter 4 on Channel Gate proposes having buildings of -10 storeys fronting the Grand Union Canal at Channel Gate.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		7		Places		P3		<p>Having buildings of 8-10 storeys will fundamentally change the character of the Grand Union Canal for ever. This proposal does not align in any case with the draft plan's policy Chapter 4 (4.49), which proposes widening the canal in an attempt at "conserving and enhancing the character of the canal". Having such tall buildings along the Grand Union Canal will overwhelm the existing two-storey high Old Oak Lane Conservation Area.</p>	<p>No change proposed. The Grand Union Canal Massing and Enclosure Statement Update continues to recommend delivering generally 6 to 8 storeys along the Grand Union Canal. This is stated in Policy P3. The proposed modifications did not amend this part of the Local Plan. OPDC considers this is justified and sound.</p>	N	

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35	Local Resident	Ewa	Cwirko-Godycka		8		Strategic Policies		SP9		6. The plan's obsession with high rise and high density building also permeates Policy 7 for North Acton and Acton Wells which proposes "tall buildings across North Acton and Acton Wells in appropriate locations in accordance with policies SP9, D54" - "generally 10 to 12 storeys along Victoria Road north of Old Oak Street," P7, 3.15 within Acton Wells East, "generally 10 to 12 storeys along Victoria Road north of Old Oak Street". Given that 10-12 storeys is the plan's benchmark for building heights at the edge of this area, existing residential areas will simply be overwhelmed and ruined by these much higher buildings in Old Oak. The plan's proposal for "generally lower heights adjacent to sensitive locations including "Wells House Road, Midland Terrace and along Jenner Avenue" is not credible either; building heights near these locations and the Island Triangle should be commensurate with them - i.e. be no more than two storeys high, so their essential and attractive Victorian/Edwardian character is retained and conserved.	<p>No change proposed. The building heights policies have not been amended as part of the proposed modifications for North Acton and Acton Wells. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		9		Design				The site behind Midland Terrace is directly to the West and so everything build there should take into account the loss of light and therefore the quality of life of the existing residents.	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The proposed modifications for P7 and P7C1 relating to North Acton are limited and continue to seek high quality high density development.</p> <p>Matters such as daylight and sunlight would be considered as part of any planning application. Policy D5 on amenity would apply. Rights to light is a civil matter and is not a matter considered in the determination of planning applications in the same way that daylight and sunlight is.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		10		Places		P8		7. Chapter 4.153 proposes keeping development to the height of The Collective (the ten-storey building adjacent to the Grand Union Canal), proposing that "Development of the Willesden Junction Maintenance Depot and sites to the south should reflect the existing height of The Collective in the north of the site and decrease to respond to the existing Victoria Terrace". This is vague and unfair: development adjacent to Victoria Terrace must be kept to two stories, as they are two story houses - these proposals will destroy the character of Victoria Terrace if enacted.	No change proposed. Modifications were not proposed for policy P8C1(g). OPDC considers the policy is sound and justified reflecting wider building heights guidance in policy P3 for canalside locations.	N	

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35	Local Resident	Ewa	Cwirko-Godycka		11		Strategic Policies		SP9		<p>Conclusion: Proposing buildings much higher than the existing ones in Old Oak will fundamentally change the amenity of existing residential areas so much, that this policy requires further consultation with local communities. The draft plan's obsession with high rise will destroy the character of the existing residential areas.</p>	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		12		Transport		T1		<p>The area does not have a sufficient road network to cope which such a high influx of new residents, after it was shifted from the Car Giant site.</p>	<p>No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. This has been informed by the Preliminary Infrastructure Design and Costing Study.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		13		Strategic Policies		SP9		<p>Local people in Old Oak who have visited the redeveloped Stonebridge Park estate only one mile to the North, can see that 4-5 storey developments have created far more attractive and sustainable communities than is being proposed for Channel Gate Road and the expansion of North Acton. This is not careful strategic development - it is the OPDC making a tactical switch after failing to develop the Car Giant site and not considering all the effects that this will have in the new chosen area.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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35	Local Resident	Ewa	Cwirko-Godycka		14		Strategic Policies		SP9		The amount of development proposed by the modified Local Plan for Channel Gate and North Acton is not sustainable. Building at such heights and density will dominate and degrade the existing low-rise residential areas.	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
35	Local Resident	Ewa	Cwirko-Godycka		15		General	Extent of changes			This proposal has been inadequately consulted on and should not be introduced as a 'modification' at this very late stage of the plan's development. It is in fact a 'Major' and not a minor change to previous plans.	No change proposed. The proposed modifications will continue to enable the Local Plan to support the delivery of sustainable high quality development in the OPDC area. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.	N	
36	Local Resident	Faye	Thomas		1		General	Delay or withdraw the plan			I am writing to request that the draft local plan be withdrawn and subject to proper 'reimagining' and further consultation.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.	N	
36	Local Resident	Faye	Thomas		2		General	Extent of changes			The original proposals have changed significantly since 2018.	<p>No change proposed. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>The majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p>	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
36	Local Resident	Faye	Thomas		3		Strategic Policies		SP7		I support the views of the st Quintin and woodlands neighbourhood forum and echo their points: The new HS2 station will not connect into the London Overground or Underground network, as the two new Overground stations originally proposed are not going to happen. So Old Oak as a 'highly connected location' has become hype rather than substance.	No change proposed. Old Oak Common station will link to the Underground network via platforms on the Elizabeth Line. In addition, the proposed Old Oak Common Lane station will be a less than 5 minute walk away to provide connections on the Overground and new West London Orbital link.	N	

36	Local Resident	Faye Thomas	4	MM/PS2/OPDC/P2/1	Strategic Policies	SP2	<p>I am writing to request that the draft local plan be withdrawn and subject to proper 'reimagining' and further consultation. The original proposals have changed significantly since 2018. I support the views of the st Quintin and woodlands neighbourhood forum and echo their points: With no new Overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.</p>	<p>No change proposed.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Both Channel Gate and Scrubs Lane were identified for development in the Submission Local Plan. OPDC considers that given the scale of development envisaged in these two locations (3,100 homes across Channel Gate and 3,500 homes across Scrubs Lane) both locations are suitable for town centre uses and housing at a range of densities as demonstrated in Local Plan supporting studies.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. These reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to 	N
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36	Local Resident	Faye	Thomas		5		Strategic Policies		SP7		I support the views of the st Quintin and woodlands neighbourhood forum and echo their points: Nothing seems to be planned as additions or changes to the local road network. Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane sees longer queues every year. Why is a new Local Plan not dealing with this issue?	<p>respond and further details of key changes.</p> <ul style="list-style-type: none"> • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N	

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36	Local Resident	Faye	Thomas		6		Housing				I support the views of the st Quintin and woodlands neighbourhood forum and echo their points: High rise housing is not what many people want or need in 2021, We have had Grenfell, lockdown living with queues for lifts, and a cladding scandal. We do not need a repeat version of North Acton in North Kensington.	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
36	Local Resident	Faye	Thomas		7		General	Delay or withdraw the plan			I support the views of the st Quintin and woodlands neighbourhood forum and echo their points: Rather than a 'modified' version of a Plan that has got worse rather than better since 2018, why not start afresh? Old Oak Common Station will not be open for 8-12 years yet. There is time to plan for a new part of London that will look to the future of the city. rather than a plan put together in 2018. I hope that the OPDC takes the time to reimagine the proposals to ensure that future developments will truly benefit the inhabitants of Old Oak and Park Royal and enhance the true potential of this forgotten part of the city.. rather than simply pushing ahead with flawed plans simply because doing so will line the pockets of corporate developers.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
37	Local Resident	Francis	McAdie		1		Places		P12		I am writing in response to the above plan in my capacity as a local resident who is also a frequent user of Wormwood Scrubs open space. I've lived in this area for 20 years and this is my personal response to the plan.	Noted.	N	

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37	Local Resident	Francis	McAdie		2		Places		P12		<p>1. The exploitation of Wormwood Scrubs beyond what it can sustain.</p> <p>The plan as a whole has totally insufficient provision for open, green recreational space for so many new residents and workers, so they will have few choices other than to go to Wormwood Scrubs. Yet the OPDC seems to have made no provision whatsoever for protecting the fragile natural habitat of Wormwood Scrubs from such massively increased footfall. Wormwood Scrubs as a natural habitat will suffer terribly yet - just one example - the plan actually refers to "vegetation" as an obstacle to be cleared away to enable cyclists and walkers travelling from the north to "access" the Scrubs more easily! Presumably this means cutting down more woodland, just after HS2 have cut down a lot already?</p> <p>How is destroying vegetation in order to save some cyclists the trouble of cycling a few yards further down Scrubs Lane helping the already severely stressed species clinging to existence on Wormwood Scrubs</p>	<p>No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site.</p> <p>Policy P12 protects Wormwood Scrubs as Metropolitan Open Land and as an area of ecological value. Any proposals involving impacts on areas of ecological value would need to reprovide a net gain in biodiversity in accordance with Policy EU2. Both Policy P12 and EU2 remain largely unaltered since the submission of the Local Plan.</p> <p>Providing improved access to Wormwood Scrubs is justified to support it's role as a Metropolitan Park serving the wider West London area, and it's role as set out in the Wormwood Scrubs Act. Any proposals for such improvements would need to be undertaken in agreement with the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust.</p>	N	
37	Local Resident	Francis	McAdie		3		Places		P12		<p>The impression is given that underlying this kind of suggestion, and the plans for Wormwood Scrubs in general, is a powerful desire to exploit the green space as much as possible, using its presence to liberate developers from the obligation to allow for recreational space in their own plans and thus to cram in more buildings. The Scrubs as we know it will wither .</p>	<p>No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site.</p> <p>Policy P12 protects Wormwood Scrubs as Metropolitan Open Land and as an area of ecological value. Any proposals involving impacts on areas of ecological value would need to reprovide a net gain in biodiversity in accordance with Policy EU2. Both Policy P12 and EU2 remain largely unaltered since the submission of the Local Plan.</p> <p>Providing improved access to Wormwood Scrubs is justified to support it's role as a Metropolitan Park serving the wider West London area, and it's role as set out in the Wormwood Scrubs Act. Any proposals for such improvements would need to be undertaken in agreement with the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust.</p>	N	
37	Local Resident	Francis	McAdie		4		Strategic Policies		SP2		<p>This plan refutes all current government directives with regard to climate change and it should be completely reconsidered.</p>	<p>No change proposed.</p> <p>OPDC considers the proposed modifications to be consistent with national policy including policies relating to mitigating and adapting to climate change. The proposed modifications are considered to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p>	N	

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37	Local Resident	Francis	McAdie		5		General	Delay or withdraw the plan			If the pandemic has taught us anything it is that our relationship with nature should be rethought.	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	1		General	Consultation			<p>The Friends of Wormwood Scrubs is an association of users of the Scrubs and a registered charity (no. 1187120) with a membership of many hundreds of users and lovers of the Scrubs, most of whom live close to the Scrubs in Ealing, Hammersmith & Fulham, Kensington & Chelsea, Westminster and Brent, all neighbouring London Boroughs.</p> <p>We have followed closely the stages of preparation of a Local Plan for the OPDC area, and have responded to previous consultations. On 1st March 2021 we wrote to Emma Williamson (OPDC Director of Planning) with copied to OPDC Board members. Our letter argued that the changes introduced in the PSMDLP go much further in nature and scope than any modifications contemplated by the 2004 Act or the Procedure Guide for Local Plan Examinations. At a purely practical level it is a well-nigh impossible task for anyone examining the document – whether consultee, planning inspector or even the OPDC – to thread their way through its red text and attempt to juxtapose with it the reasons in the Table of text modifications in a second document and the Table of figure modifications in yet a third document and arrive at some sort of coherent idea of the meaning of the plan.</p> <p>David Jeffreys, then a Trustee of FOWWS, subsequently wrote on behalf of the Friends to Planning Inspector Paul Clark on 14th April, with the view that in reality OPDC had been preparing a hybrid of Draft Local Plan and modifications. You will have copies of the relevant email exchanges.</p> <p>Nothing subsequently has changed our view that the Draft Local Plan as modified is unsound for a range of reasons. These include flaws of process as well as of content.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>We have sought to ensure that the modifications themselves and the reasons behind them have been made clear. The process for producing a track changed Local Plan, with accompanying table of text and figure modifications is well established best practice for showing proposed modifications at this stage of the examination.</p>	N	

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38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	2		General	Extent of changes			<p>Our organisation is concerned with Wormwood Scrubs and the role that it plays as one of London's larger pieces of Metropolitan Open Land. In terms of the content of the PSMDLP this representation confines itself matters relevant to this role. For the public to keep up with the plans and proposals coming forward from OPDC as well as HS2 is hugely demanding. One of the main things that our members seek from both bodies is clarity and honesty, in communications and 'community engagement'. Both qualities are missing in OPDC's alleged consultations with the public.</p> <p>The OPDC will no doubt claim to have consulted extensively on the PSMDLP proposals. The Corporation's starting point was to circulate to households a 'Dear owner/occupier' letter dated 17th May. This gave details of the final round of consultation on the PSMDLP (ending 5th July).</p> <p>This letter stated 'Although much of our Draft Local Plan hasn't changed, we are no longer bringing forward housing in Old Oak North but protecting it as a place of employment'.</p> <p>This claim that 'much hasn't changed' is incorrect, untruthful and highly misleading.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	3		Places		P10		<p>The label 'Old Oak North' means little to most people. When they realise that these late 'modifications' to the Draft Local Plan introduce wholly new proposals for high density/high-rise development to the west of the Scrubs (at Channel Gate) and to the north-east at a 'Mitre Way Cluster', their level of concern rises swiftly.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area. The proposed modifications continue to identify the area for high density development.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. Policies within the Local Plan seek to minimise car parking and ensure that impacts on the road network during construction are minimised.</p>	N	

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38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	4		General	Extent of changes			In terms of process we therefore consider that: The consultation undertaken by OPDC, in its publications, leaflets, website, and at online sessions has, perhaps deliberately, significantly misrepresented the scale of change to the 2018 Draft Local Plan	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	5		General	Extent of changes			The modifications, developed between October 2019 and March 2021, have involved extensive further 'preparation' activity and have changed all the major spatial and transport proposals in the Old Oak part of the Draft Local Plan. As in our previous letter and emails sent prior to the consultation, we do not believe that the PCPA 2004 provides for such a hybrid process to take place during the course of examination of a Local Plan.	<p>No change proposed. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>The majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p>	N	

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38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	6		Places		P12		<p>The role of Wormwood Scrubs, originally common land and still a registered common, is set out in the 1879 Wormwood Scrubs Act of Parliament as “for the perpetual use thereof by the inhabitants of the metropolis for exercise and recreation”. LB Hammersmith & Fulham, through its Wormwood Scrubs Charitable Trust Committee now exercises the responsibilities which Parliament originally vested in the Metropolitan Board of Works. FOWWS has two of its Trustees invited as co-opted Members of this LBHF committee.</p> <p>The membership of FOWWS have long pursued an approach that this open space should retain its character as ‘more wild than tamed’ an officially recognised – including by OPDC – designation. The Scrubs Is an area of some 80 hectares of MOL close to the centre of London highly valued for its ecology, its bird life, and above all its sense of openness and its semi-rural environment. It is important for the mental health of its users and neighbours, and for the maintenance of clean air quality, now both official national objectives.</p> <p>This quality, valued enormously by those Londoners who do not have access to gardens or private open space, has already been eroded by high rise development in the surrounding areas. Levels of traffic congestion on the surrounding roads worsen steadily, with HS2 construction activity already taking its toll to the immediate west of the in terms of pollution and seriously poor air quality.</p>	No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site. HS2 and its construction activities are governed by its own Act of Parliament and fall outside of the remit of OPDC's Local Plan.	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	7		General	Delay or withdraw the plan			<p>In summary, our concerns about the content of the PSMDLP are as follows: We do not understand why OPDC and the Mayor remain intent on adoption of a poorly modified Local Plan for the Old Oak half of the OPDC area. For various reasons, set out below, this would be better delayed to allow proper consideration of many new factors.</p>	No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.	N	

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38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	8		General	Extent of changes			<p>Much of the original 2015 'vision' for regenerated part of West London has been lost. Over ambitious housing targets should have been revised in the 2021 London Plan, following the Inspector's 2019 interim findings and the abandonment of plans for the Cargiant landholding.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>Housing capacities for sites are defined in the Development Capacity Study (DCS) Update and demonstrate that the London Plan's housing targets are achievable.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	9		General	Delay or withdraw the plan			Old Oak Common station is not due to open for a further decade (2029-33). 2021 should be a time for a rethink rather than an attempt to set in stone the future of Old Oak.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	10		Strategic Policies		SP6 and SP7		<p>As a set of regeneration proposals the modified Plan lacks coherence. It does not create a recognisable 'major town centre'. It does not join up East Acton to the west and North Hammersmith/North Kensington to the east. It does not provide eastern access to a rail interchange of an enormous £1.7bn cost to the public purse.</p>	<p>No change proposed. The proposed modifications relating to the updated location of portions of the Old Oak Major Town Centre are considered to be justified and effective.</p> <p>Policy SP6 defines the proposed town centre hierarchy. The Local Plan and proposed modifications are clear in the distinction between the Old Oak Major Town Centre and North Acton Neighbourhood Town Centre. Further guidance is provided for portions of the major town centre within the Places Chapter.</p> <p>The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Local Plan and IDP contain a series of new and enhanced connections which will ensure that development sites are well connected to public transport and into surrounding neighbourhoods.</p>	N	

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38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	11		Places		P1C1		The great majority of users of the new station will be simply inter-changing between HS2 and the Elizabeth Line, not using it for embarkation or disembarkation by local residents, particularly given the very poor access, pedestrian and vehicular, to the new station.	No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in its own right, similar to Kings Cross. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area.	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	12		Places		P12		The adverse impact on views from the Scrubs will be significant, with new clusters of high rise buildings at Channel Gate and at Scrubs Lane/Mitre Way – adding to the destruction of skylines that has already taken place	No change proposed. The change in approach to development at Old Oak North and Channel Gate is likely to result in less of an impact on the skyline from Wormwood Scrubs. An assessment undertaken as part of the Scrubs Lane Development Framework has found that there is no increased impact on Wormwood Scrubs as a result of the proposed modifications.	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	13		Strategic Policies		SP7		In the absence of new Overground stations, and any significant additions to the local road network, traffic levels on routes around the Scrubs will continue to worsen, initially for construction and later for servicing.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	
38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	14		Places		P12		The capacity of the Scrubs to soak up carbon emissions and improve air quality in the wider area will be seriously compromised.	No change proposed. The Local Plan proposes sensitive enhancements to Wormwood Scrubs, which have the potential to significantly increase levels of biodiversity and improve climate resilience.	N	

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38	Community / interest group	Stephen	Waley-Cohen	Friends of Wormwood Scrubs	15		General	Delay or withdraw the plan			In post-pandemic London, when we get there, it will be necessary to re-examine transport patterns and housing needs. It make no sense to fix the plans for this huge but now compromised Development area without knowing what will be the future needs.	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
39	Local Resident	Gennaro	Picardi		1		Strategic Policies		SP9		I am a resident and business in North Kensington. I share the views of St Quintin and Woodlands Neighbourhood Forum and don't agree with the fundamental principles of high density high rise living in this part of London and urge you and the developers to totally rethink and reshape their proposals.	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.</p> <p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	
39	Local Resident	Gennaro	Picardi		2		Strategic Policies		SP4		Lack of a realistic housing need reappraisal: in most cases assumptions of continual exponential growth have been proved wrong and in any way shouldn't be encouraged	<p>No change proposed. The modifications have been proposed in response to the Planning Inspector's Interim Findings and to ensure general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets. The modifications ensure that OPDC can help meet local and London housing needs, including affordable housing. The Secretary of State for Housing, Communities and Local Government's December 2020 ministerial statement on housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs which if anything, points to an increased need for housing since OPDC submitted its Local Plan. Notwithstanding this, Government requires that Local Plans are reviewed within 5 years of adoption and housing needs would be picked up within this review, at which point, the impacts of the Covid pandemic on housing needs will be clearer.</p>	N	

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39	Local Resident	Gennaro	Picardi		3	MM/PS2/OPDC/P2/1	Places		P10		Lack on integrated infrastructures: with no new Overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is the 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. I anything, the previous housing numbers should come down at locations where public transport is inadequate.	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
39	Local Resident	Gennaro	Picardi		4		Places		P10		Current inadequacy of the local road network: see for instance frequent long queues at North Pole Road and its junction at Wood Lane/Scrubs Lane and heavy traffic generally.	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.	N	

39	Local Resident	Gennaro	Picardi	5	MMPS2/OPDC/P10C5/1	Places	P10C5	<p>There is no evidence that High rise housing is where many people and families want or need in the future The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. More residential towers are also planned for Scrubs Lane. How were we meant to hear about these latest plans? They will destroy the views from our local open spaces.</p>	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and 	N
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40	Community / interest group	Robin	Brown	Grand Union Alliance	1		General	General			<p>This response deals only with the Main Modifications and is submitted having had close working with the Old Oak Neighbourhood Forum for some time during the pandemic. It therefore does not seek to repeat all the points made in the submission of the Old Oak Neighbourhood Forum (OONF) and St Quintin Woodlands Neighbourhood Forum (StQW) the basis of which was prepared in open joint sessions. Where especially relevant, the Grand Union Alliance states that it is endorsing particular parts of the OONF & StQW submission to obviate unnecessary duplication in written material.</p> <p>This response is collaborative rather than a definitive collective response - drawing together a wide range of comments from representatives of resident and community groups that have engaged in discussions on the PSMDLP since the Autumn 2020. The earlier responses to the Regulation 19 consultations are still a valid expression of the GUA's positions and this set of comments does not attempt to cover all of the changes advanced by the OPDC. Simply to supplement other community responses, particularly those of OONF/ StQW, on degrees of emphasis, provide additional commentary and matters.</p>	<p>Get West London.</p> <ul style="list-style-type: none"> • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		
													N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	2		General	General			Some difficulties have been encountered in determining which is a Minor Modification and which is a Main Modification as both such references are included in the Ref. Column of the Tables of text, it is said for 'clarity'. The consequence of this, unfortunately, has been a laborious struggle to correctly reference the following comments. This has diverted limited available time from analysis of and responding to the Modifications. In addition, key issues with the scope and content of the PSMDLP have become apparent, but respondents have been constrained in finding appropriate Main Modifications to which comments can be made to accord with the strictures of this round of consultations. We strongly urge the OPDC to advise the Inspector to treat discussion at any resumed hearings with significant latitude in order that the PSMDLP is scrutinised to the degree that the highly significant Modifications warrant.	<p>Noted. No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>In some instances, Main Modifications are within the same sentence or paragraph as Minor Modifications. Where this is the case, both modifications are shown in the Main Modifications and Minor Modifications Tables and referenced for clarity.</p> <p>The Inspector will review all consultation comments and OPDC officers' responses to determine whether further hearings are required.</p>	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	3		General	Extent of changes			<p>OVERVIEW OF PSMDLP</p> <p>Tests of soundness and legal compliance</p> <p>For some time what is known as Part 1 of OONF/ StQW's comments on the PSMDLP have been in circulation in various iterations. This Part 1 addresses what the Forums see as key points in terms of the 'soundness' and legal validity of the PSMDLP and its supporting documents. The theme and conclusions are that the PSMDLP is not sound for the various reasons set out; and that this is a wholesale revision of the Submission Plan, involving that is 'preparation' rather than discrete surgical changes, going beyond the reasonable bounds of Main Modifications. The GUA endorse this Part 1, its findings and conclusions.</p>	<p>No change proposed. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>The majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p>	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	4	MM/PS2/OPDC/SV/3	Spatial Vision				<p>MM/PS2/OPDC/SV/3</p> <p>Thinking Big: The substitution of OPDC area for Old Oak and other such associated Modifications to reflect the proposed changes in land use designations is merely the proverbial 'tip of the iceberg' with a whole raft of highly significant Modifications and ramifications not explicitly revealed by this seemingly innocuous word change. These are set out in the OONF/ StQW response mainly in the Place section and are endorsed by the GUA.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	5	MM/PS2/OPDC/SV/5 & SV/9	Spatial Vision			Figure 2.1	<p>MM/PS2/OPDC/SV/5 & SV/9</p> <p>Figure 2.1: The changes to the homes and new jobs outputs of the Plan are other Modifications that are composed of few words/numbers, but are the product of far reaching changes elsewhere in the Plan. They are repeated in the Strategic Policies: Policy SP1's para 3.3 MM/PS2/OPDC/SP/2</p> <p>SP4a) ... SP/6</p> <p>SP4's para 3.20 ...SP/8</p> <p>SP5a) ... SP/9</p> <p>SP5's para 3.25 ... SP/11</p> <p>The PSMDLP intensifies the concerns the GUA has expressed in responses to previous rounds of consultation regarding the viability and effectiveness of the Plan given the mathematical reconstruction of the targets for homes and jobs and the swapping of site allocations; rather than the product of a conscientious derivation from the vision and objectives of this Plan and the London Plan as good and proper planning. The lack of any viable financial plan for the infrastructure needed for the development places extreme pressure on Section 106 development mitigations and affordable housing and any possible future CIL earnings; and is likely to result in the approval of developments which do not fully conform with the stated policies in this Plan.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that is an exemplar in healthy and sustainable large-scale development.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The development capacity set out in the proposed modifications has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>OPDC's Whole Plan Viability Study and Strategic Sites Viability Assessment demonstrate that development is viable across the OPDC area.</p> <p>The Infrastructure Delivery Plan sets out a transparent assessment of infrastructure costs, the potential for planning contributions and other funding sources to meet these costs and we consider that this provides effective justification that the infrastructure required to support the Local Plan is fundable and deliverable.</p>	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	6	MM2/PS/Q3b	Strategic Policies		SP3		<p>SP3: Improving Health and Reducing Health Inequalities MM2/PS/Q3b</p> <p>Re the deletion of policy requirements for a Health Impact assessment: Covid-19 has revealed and exacerbated pre-existing inequalities in the socio-economic attributes of populations, including around health. Furthermore, the roles of the natural and built environments in promoting or degrading health of individuals and communities and how these positives and negatives ought to be addressed in planning and development are becoming more understood. Consequently, the GUA sees this Policy clause deletion as a retrogressive step by relegating expectations for Health Impact Assessments to supporting text, a diminution in the effectiveness of Policy SP3 and its contribution to the effectiveness of the Plan.</p>	<p>No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.</p> <p>Local Plan policies for improving health and reducing health inequalities continue to be justified, effective and sound.</p>	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	7	MM/PS2/OPDC/SP/13 & MM/PS2/OPDC/P1/3	Strategic Policies		SP6		<p>SP6: Places and Destinations MM/PS2/OPDC/SP/13</p> <p>SP6a)iii Policy clause offers support for a Cultural Quarter, but the same doubt applies that is expressed for Catalyst Uses in this response to Policy TCC7 about the realism, the likelihood and practicality of such a proposal being able to be assimilated into other proposals in the draft Local Plan given the maximisation of the Plan's site allocations. However, in respect of a Cultural Quarter, Policy P1 Old Oak South does give a broad location (MM/PS2/OPDC/P1/3), but given the site allocations this is likely to an aspiration for the post plan period.</p>	<p>No change proposed.</p> <p>This is not a part of the Local Plan that has been modified in response to requests by the planning inspector. Nevertheless, Policy SP6 sets out the policy support for the creation of a cultural quarter in the OPDC area. OPDC's Cultural Principles document sets out how the OPDC area could play a significant role in supporting new and enhanced cultural uses, and promote Mayoral aspirations for London as a cultural and arts capital.</p> <p>While it is not yet possible to include specific proposals for where and how a cultural quarter will be delivered, OPDC will work with the GLA, boroughs and developers to ensure cultural provision will be secured through development proposals which support the creation of a cultural quarter in the area.</p>	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	8	MM/PS2/OPDC/SP/14	Strategic Policies		SP6		<p>MM/PS2/OPDC/SP/14 SP6b)a Policy clause concerns the Major Town Centre by which its geographical locale is 'liberated' from Old Oak (North & South) in order to provide the strategic policy hook for its 'relocation' to range from Channel Gate to North Action. The OONF/ StQW response voicing scepticism as to its deliverability given the practical challenges presented by topography, land availability etc. and unlikely demand is endorsed by the GUA which has also addressed the Major Town Centre in Policy TCC1 below.</p>	<p>No change proposed. The only modification has been to flip the part of Old Oak Major Town Centre that was in Old Oak North to that part now being within Channel Gate. The remainder of Old Oak Town Centre has remained as it was in the Submission Local Plan. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>Town centre uses are already being delivered within the Atlas Junction cluster through the Collective and Oaklands Rise schemes, and will continue to be delivered from other sites as and when they come forward to support delivery of a comprehensive town centre.</p>	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	9	MM/PS2/OPDC/SP/23	Strategic Policies		SP7	Figure 3.10	<p>SP7: Connecting People and Places Fig.3.10 MM/PS2/OPDC/SP/23</p> <p>This PolicySP7e)ii amends the geographical locating of a new movement network and leaves it to Fig 3.10 to portray its location(s), but this is illustrative only and significant parts of the routes have uncertain funding and are to be delivered after the plan period.</p>	<p>No change proposed. The purpose of a Local Plan is not to provide detailed design for proposals but to provide policy support to facilitate future design work. As such, a Local Plan only includes illustrative plans. The IDP sets out the infrastructure required to deliver the planned growth, the majority of which will be delivered within the plan period.</p>	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	10	MM/PS2/OPDC/SP/34	Strategic Policies		SP8		<p>SP8: Green Infrastructure and Open Space MM/PS2/OPDC/SP/34</p> <p>SP8a)iii with its reduction in the provision of local parks has been addressed in the response to Policy EU1 below.</p>	<p>Noted. Please see response to comments on Policy EU1.</p>	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	11	MM/PS/OPDC/M4	Strategic Policies		SP9	Para 3.78	SP9: Built Environment MM/PS/OPDC/M4 Para 3.78 has received an additional sentence on density range for development (outside SIL). From this Main Modification the OONF/StQW has elaborated an extensive response on housing density which the GUA endorses.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	12	MM/PS2/OPDC/SP/38	Strategic Policies		SP10	Table 3.1	SP10: Integrated Delivery MM/PS2/OPDC/SP/38 Table 3.1 The list of site allocations with new development quanta are addressed where appropriate in the Places section of the OONF/ StQW response which the GUA endorses.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	13		Places				4 PLACES OONF/ StQW response on Places Chapter has written in detail on various places: P1 Old Oak South; P2 Old Oak North; P7 North Acton & Acton Wells; P8 Old Oak Lane & Old Oak Common Lane; P9 Channel Gate and P10 Scrubs Lane. This the GUA endorses.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	14	MM17/PS/Q3e	Design		D4	Figure 3.1	D4: Tall buildings MM17/PS/Q3e Fig 3.1 The GUA endorses the response on this Policy made by OONF/ StQW including the Tall Buildings Statement Update 2021 appended to their commentary on Policies.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments. No change proposed. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	15	MM17/PS/Q3e	Design		D4	Figure 3.1	Part of their arguments revolve around a proper understanding of the requirements of the relevant London Plan Policy referenced in PSMDLP's para 5.44. There is no such map layer in the Policies Map identifying locations and appropriate building heights (London Plan Policy D9(2)). Para 1.25 of PSMDLP explains that all figures (other than the Policies Map) are illustrative only and therefore do not conform to the London Plan's requirements for a map within the Development Plan and the Plan's operational need for certainty and clarity.	<p>No change proposed. Proposed modified figure 3.15 provides indicative locations for sensitive locations and tall building locations. Figure 3.15 is based on an Ordinance Base.</p> <p>This relates to proposed modification MM1/PS/Q2Q8Q1 made in response to the Inspector's queries regarding the Local Plan's figures relationship to an Ordinance Base. OPDC considers this to be consistent with national policy and legally compliant.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC considers the approach to tall buildings to be in general conformity with the London Plan 2021 and the Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p>	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	16	MM/PS/OPDC/M2e(2)	Design		D8		D8: Play Space MM/PS/OPDC/M2e(2) Para 5.75 making ground level play space as a priority and deleting references to podiums, terraces or roofs is very much welcomed and supported. This Policy will be read along with the new London Plan 2021 which sets out some useful pointers on how formal play provision is provided.	Noted.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	17	MM/PS2/OPDC/EU1/2	Environment and Utilities		EU1		EU1: Open Space MM/PS2/OPDC/EU1/2 The reduction from three to two local parks is opposed given that intense development is proposed for the North Acton and Acton Wells Place. The Acton Cemetery and the possible new publicly accessible spaces of Victoria Gardens and Acton Wells Square do not constitute an adequate provision remedying the deficiencies in access to parks. Planned provision at Channel Gate and Old Oak Common station would be beyond reasonable distances.	<p>No change proposed.</p> <p>Due to the proposed retention of the Old Oak North as SIL, it is no longer deliverable to provide the two Local Parks that were previously proposed for this place, one of which was to be centred on the Grand Union Canal and form part of an expanded Birchwood Nature Reserve within Old Oak South.</p> <p>A proposed new Local Park has been identified for the Channel Gate place to support that new community, in addition to the Local Park being proposed adjacent to Old Oak Common Station. New communities at North Acton and Acton Wells will be within the same distance of a Local Park as they were previously in the submission Local Plan, while the Channel Gate local park will be closer to North Acton than the previously proposed Old Oak North local park.</p> <p>While the number of Local Parks to be delivered within the plan period is reduced from three to two, the requirement for 30% of the developable land outside of the SIL to be delivered as publicly accessible open space remains. The same amount of overall public open space is to be provided as was previously proposed, though more of this will now be delivered through smaller public open spaces.</p>	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	18	MM2/PS/Q3I	Environment and Utilities		EU4		EU4: Air Quality MM2/PS/Q3I The deletion of Air Quality Assessment et al from the Policy and its relocation to para 6.45 is a retrograde step given the health significance of air pollution – as exemplified by the first finding by a Coroner of death attributed to air pollution late last year. The combination of tall and high buildings and intense density inevitably producing canyon like streets in an area already experiencing high levels of pollution requires that there be a thorough understanding of the situation, the likely impacts of a development and the securing of mitigations, This requires the strength and purpose of a Policy, not just a reference in supporting text.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	19	MM/PS2/OPDC/EU6/1	Environment and Utilities		EU6	6.69	EU6: Waste MM/PS2/OPDC/EU6/1 Para 6.69: The current West London Waste Plan (WLWP) was out of date on its adoption. Since then, as this paragraph observes, the new London Plan has revised apportionment targets. A new WLWP is needed and it is disappointing that the OPDC is not expediting this with the potential contributing boroughs. The continuance and/ or re-provision of waste sites is problematical for the quality of development and living conditions expected by the PSMDLP and local residents/ businesses. For Policy EU6 to be effective it should be informed by up to date relevant Waste Plans.	No change proposed. The West London Waste Plan (WLWP) is part of OPDC's Development Plan and the Local Plan reflects the WLWP position. the new London Plan waste apportionment targets were only adopted in March 2021. The seven planning authorities worked together on the previous WLWP and paragraph 6.70 (MM/PS2/OPDC/EU6/1) states that OPDC will work with the host boroughs and other waste planning authorities covered by the WLWP to adopt a new WLWP. OPDC's Local Plan Policy D6 includes policy provisions to protect amenity.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	20	MM/PS2/OPDC/T5/1	Transport		T5		T5: Rail MM/PS2/OPDC/T5/1 (see also earlier Fig2.1 MM/PS2/OPDC/SV/6, Policy P7C2 Old Oak Common Lane station Cluster MM/PS2/OPDC/P7C2/1) Para 7.37 refers to the 'potential London Overground Station at Old Oak Common Lane'. The GUA wishes to endorse the comments made by OONF/ StQW at various points in their submission: that this station is not a realistic proposition and is unlikely to be so for the foreseeable future given the precarious state of TfL's finances and the demands that financing such a piece of infrastructure make on the viability of development. However, safeguarding of this together with passive provision for the Dudding Hill line for the West London Orbital is supported if a suitable amenity relationship could be achieved with nearby homes. However, the original TfL scheme did not demonstrate a satisfactory relationship. The 'potential Old Oak Common Lane Station' is shown on Fig 7.11 Future PTAL. Since the London Plan Policy D2A1 looks to future connectivity to determine the acceptability of development, the status and deliverability of Old Oak Common Station needs clarity and certainty.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments. Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project. Please refer to responses to comments 133/5 to 133/13.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	21		Delivery and Implementation		D11		It is understood that John Cox will be responding further in his own response on this wider matter of the exact status of pieces of infrastructure having regard to the NPPF 2012 paras 41, 157 and 177. In the examination of the Vale of Aylesbury draft Local Plan there was such a discussion as to whether certain pieces of infrastructure were "critical", "necessary", "required" or "aspirational".... (See Inspector's note on the 13th April 2021 session at https://www.aylesburyvaldc.gov.uk/matters-arising-main-modifications-hearing-sessions-13-april-%E2%80%9329-april-2021). Such a discussion is necessary for the PSMDLP, not only in respect of Old Oak Common Station, but for other infrastructures proposals set out in the Infrastructure Delivery Plan.	No change proposed. While projects may vary in terms of their importance, OPDC does not consider that sub categories are appropriate for projects considered necessary to support homes and jobs identified within the Local Plan period. "Necessary" projects are considered a requirement to enable the development capacity and key policy requirements of the Local Plan to be delivered. Proposals should contribute to and/or deliver these projects. "Desirable" projects are not considered to be required to support development capacity within the plan period but have been identified for safeguarding purposes. Policy SP10e safeguards land for all the infrastructure within the OPDC Local Plan.	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	22	MM/PS2/OPDC/H1/1 to H1/7	Housing		H1		H1: Housing Supply MM/PS2/OPDC/H1/1 to H1/7 See OONF/ StQW's submission on this Policy regarding meeting the London Plan's 10 year target as part of achieving the 2021 London Plan's expectations for the Old Oak & Park Royal Opportunity Areas in order to be in general conformity with the London Plan. The GUA shares the concerns of OONF/ StQW that good growth and sustainable development with the necessary supporting infrastructure will not result from the delivery of home numbers in Policy H1 and supporting text.	Noted. Please see responses to representations from STQW OONF.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	23	MM/PS2/OPDC/E1/2 & MINOR 2/E1/4	Employment		E1		E1: Protecting, Strengthening & Intensifying the Strategic Industrial Location MM/PS2/OPDC/E1/2 MINOR 2/E1/4 This Modification to E1c is noted, but para 9.25 of E3 Supporting Small Businesses and Start -Ups MM/PS2/OPDC/E3/1 appears to run contrary to Policy E1c generating an internal inconsistency within this part of the PSMDLP. Whilst a degree of flexibility is necessary, re-providing suitable premises for all existing businesses across the OPDC area should be a priority in any development in Park Royal, Old Oak North and elsewhere.	No change proposed. It is not considered that the two policies run contrary to one another. Policy E1c is about ensuring a mix of unit sizes and re-providing any small units. Para 9.25 recognises that where existing tenants are expanding their business, it may not be practicable to provide new small units on-site and that alternative means of supporting small businesses may be considered in these circumstances. In accordance with Policy E1, in such a circumstance where the expansion of an existing tenant results in the loss of other existing small businesses, their re-provision, either on-site or through in lieu off-site provision or contributions, would be prioritised.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	24	MM/PS2/OPDC/E1/2 & MINOR 2/E1/4	Employment		E1		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 [ed: PSMDLP says industrial floor space capacity]" 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.	No change proposed. The reference to Industrial floorspace capacity is used (modification reference MINOR/2/E1/1) to clarify that the policy applies in circumstances where there was reduced or no existing industrial floorspace on site i.e. where sites have been cleared in advance of the submission of a planning application. Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the Local Plan strategic jobs target - 36,350 new jobs - and the Plan identifies sites that will contribute towards delivering this target. Policy E1 seeks to ensure a range of suitable workspaces are delivered so that industrial uses and different business sizes can be accommodated within the Strategic Industrial Location. The range of workspaces will help provide opportunities for industrial businesses to stay, grow and locate in the OPDC area.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	25	MM/PS2/OPDC/E1/2 & MINOR 2/E1/4	Employment		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.	No change proposed. Paragraph 9.18 sets out a sequential approach if applicants are supporting businesses to relocate off site. The first step in the sequential process focusses within the OPDC area.	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	26	MM/PS2/OPDC/E1/2 & MINOR 2/E1/4	Employment		E1		* Re the Modification inserting 'capacity' to Policy E1a: if the OPDC could demonstrate that capacity embraced not only considerations of floor space but also job numbers and was written into PSMDLP then this would go some way to providing the necessary reassurances and enabling the authority to meet that part of the London Plan's strategic quanta of development expressed in jobs.	No change proposed. The reference to Industrial floorspace capacity is used (modification reference MINOR/2/E1/1) to clarify that the policy applies in circumstances where there was reduced or no existing industrial floorspace on site i.e. where sites have been cleared in advance of the submission of a planning application. Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the Local Plan jobs target - 36,350 new jobs - and the Plan identifies sites that will contribute towards delivering this target.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	27		Employment		E1		It is of workspaces/ sites, jobs, skills and economic and business opportunities that this Chapter 9 addresses. But it is difficult to identify a Main Modification to relate the following concern. Recent development trends, previously 'big box' warehousing and currently 'data centres' may well be argued to retain and intensify industrial floor space, but their job creation is often much lower than many existing businesses operating within the OPDC area. Functionally they may contribute to economic vitality and productivity elsewhere, but the strengthening and intensifying OPDC's industrial areas and supporting new employment growth as per para 9.3 (MM/PS2/OPDC/E/3) is doubtful. And it is a jobs target, as noted above, rather than a floor space target that is part of the London Plan's strategic quanta of development.	No change proposed. Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the strategic jobs target - 36,350 new jobs - and the Plan identifies sites that will contribute towards delivering this target. The 2021 London Plan policies on Strategic Industrial Locations (SIL) expects development plans, amongst other things, to protect and intensify the function of SILs and make more efficient use of land. The Local Plan is in general conformity with this by protecting the function of SIL and seeking to intensify sites.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	28	MM6/PS/Q3u	Employment		E5		E5: Local Access to Training, Employment and Economic Opportunities MM6/PS/Q3u E5 and para 9.35 are welcomed in supporting the fulfilment of economic opportunities for those living and/ or working both within the OPDC area and adjoining areas, being key to securing much needed socio-economic uplift (re para 9.33).	Noted.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	29	MM/PS2/OPDC/TCC1/3 MM/PS2/OPDC/TCC1/2	Town Centre and Community Uses		TCC1	10.4	TCC1: Town Centre Uses MM/PS2/OPDC/TCC1/3 MM/PS2/OPDC/TCC1/2 Re paras 10.4 and elsewhere: on the deletion of Atlas Junction as a neighbourhood centre coupled with the expression of doubt that a Major Town centre (as defined in the London Plan 2021) is warranted is set out in the OONF/StQW response to chapter 10. This is endorsed by the GUA.	Noted. Please refer to OPDC's response to the relevant comments from OONF/StQW.	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	30	MM/PS2/OPDC/TCC1/3	MM/PS2/OPDC/TCC1/2	Town Centre and Community Uses	TCC1	10.1	Re para 10.10: the unfolding dynamics of retailing and likely town centre uses are not simply because of regulatory changes (Use Classes Order), but because of the acceleration in pre-Covid 19 trends to more on-line shopping, need for local workspace and services etc. . The OPDC's Retail and Leisure Needs Study has not been updated for PSMDLP and consequently the town centre hierarchy and its designations/ broad locations are not supported by up to date evidence. Policy TCC1f) as a Development Management instrument is insufficient in this regard.	No change proposed. OPDC does not consider it necessary to update the Retail and Leisure Needs Study to support the proposed modifications. The overall quantum of homes and jobs during the Local Plan period has remained largely as it was in the Submission Local Plan - albeit slightly lower. The need and rationale for a major town centre is still justified as the previous modelling showed that the combination of retail, food and beverage and office uses would in floorspace terms, put the Old Oak Major Town Centre comfortably within the London Plan definition for a major town centre. The impact of this town centre on the hierarchy of surrounding centres is considered to be less significant than it was in the Submission Local Plan. This is in part because the homes and jobs capacity has come down slightly, meaning that a lower proportion of town centre use floorspace is now being proposed, and in part because the geographic location of Old Oak Major Town Centre is now further from Harlesden Town Centre, which was the centre most likely to be impacted by the planned Old Oak Major Town Centre. Old Oak Major Town Centre now being located further away from Harlesden Town Centre will diminish the direct competition with this centre. The impacts of Covid on the retail centre are yet to be fully understood. OPDC will be undertaking a review of the Local Plan following its adoption and at this point, there will be more clarity on the impacts of Covid and the potential to reflect on whether and designations need to be revisited.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	31	MM/PS2/OPDC/TCC1/5	MM/PS2/OPDC/TCC1/5	Town Centre and Community Uses	TCC1	10.11	MM/PS2/OPDC/TCC1/5 Re para 10.11: the subsuming of Atlas Junction into Old Oak Major Town Centre and the application of 5000sqm threshold* may enable town centre uses with large floor spaces not caught by this threshold to locate in and around Channel Gate/ Atlas Junction to the detriment of development more compatible with the highway network, local residential areas and the vitality and vibrancy of Harlesden Town Centre. Harlesden Town Centre is likely to be impacted by the OPDC's Major Town Centre plans (as recognised in unchanged para 10.13). 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.	No change proposed. While the proposed location of Old Oak Major Town Centre has changed, it will now be located further from Harlesden Town Centre than previously proposed and will be delivering slightly less town centre use floorspace and therefore the impact on Harlesden Town Centre is considered to be diminished compared to the Submission Local Plan. Notwithstanding this, the provisions of the Policy TCC1 -h) and supporting text in paragraph 10.13 remain and are effective in ensuring that potential adverse impacts on Harlesden Town Centre are effectively mitigated.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	32	MM/PS2/OPDC/TCC1/5	MM/PS2/OPDC/TCC1/5	Town Centre and Community Uses	TCC1		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.	No change proposed. The proposed modifications did not amend this part of the Local Plan. OPDC cannot set planning policy for areas outside of its administrative area with regards to outlets with negative health impacts. Notwithstanding this, both LB Hammersmith and Fulham and LB Brent have similar provisions within their Local Plans to control such uses, while this has been reinforced on a plan London basis in the London Plan (2021) through Policy E9.	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	33	MM/PS2/OPDC/TCC1/5	Town Centre and Community Uses		TCC1		*Policy TCC1g incorrectly references the wrong paragraph for the thresholds. These are at para 10.11.	Change proposed. It is proposed to amend the text so that the correct paragraph number will be referenced in Policy TCC1 g).	Y	40/33
40	Community / interest group	Robin	Brown	Grand Union Alliance	34	MM2/PS/Q3v	Town Centre and Community Uses		TCC2	10.17	MM2/PS/Q3v Re para 10.17 on outdoor uses/ event spaces and residential amenity considerations is welcomed, whilst recognising that 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. It is regretted that the management plan requirement is to be deleted from Policy TCC2b).	Noted. The requirement for a management plan has been relocated from policy text to supporting text at the direction of the Inspector to ensure the effectiveness of the plan.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	35	MM/PS2/OPDC/TCC4/5 MINOR /2/TCC4/15	Town Centre and Community Uses		TCC3	10.29	TCC3: Social Infrastructure MM/PS2/OPDC/TCC4/5 MINOR /2/TCC4/15 Re para 10.29 on the change of proposed location for a health facility: the preference for one health facility space is understood for reasons of clinically more effective healthcare provision and that the search for a site will be within North Acton and Acton Wells. But adequate pick up and drop off facilities are essential because many users of services at a health centre cannot use public transport due to physical disability or conversely are dependent on good levels of public transport. Therefore, location and siting is of critical importance, particularly since parts of North Acton and Acton Wells may not be at the geographical heart of the planned eventual population distribution within the OPDC area when built out. Parts of North Acton and Acton Wells could be off centre so as to speak of this population distribution, relatively inconveniently located (e.g. because of the gyratory system) and at variance with Policy clause TCC3d)ii.	No change proposed. New and improved connections will help to ensure that the North Acton and Acton Wells place is well connected to other parts of the regeneration area, while improvements to the local street network within North Acton is also identified as necessary in the IDP. As with all major developments, proposals delivering a new health centre will be required to produce a transport assessment detailing how transport proposals associated the development with cater for all users, including disabled and vulnerable users.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	36	MM/PS2/OPDC/TCC4/6 MINOR 2/TCC4/6	Town Centre and Community Uses				MM/PS2/OPDC/TCC4/6 MINOR 2/TCC4/6 MINOR 2/TCC4/12 Re para 10.30: welcome availability and affordability of new community space. As the GUA wrote in the Reg19(2) response: 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 ... 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.	Noted. No change proposed. This was not a part of the Local Plan that has been modified. However, the Local Plan notes the potential for innovative approaches to funding and management of community uses including the potential for community ownership and management of assets. Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. Policy TCC3 sets out the social infrastructure needs for the area including schools, health facilities and community spaces.	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	37	MM/PS2/OPDC/TCC4/3	Town Centre and Community Uses		TCC3	10.27	MM/PS2/OPDC/TCC4/3 Re para 10.27: the concern expressed in OONF/ StQW's response on Policy TCC3 on reducing planned provision of schools/ school places is endorsed.	Noted. See responses provided to OONF/StQWs comments.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	38	MM/PS2/OPDC/TCC8/1	Town Centre and Community Uses		TCC8		TCC7: Catalyst Uses MM/PS2/OPDC/TCC8/1 Doubt has been expressed about the realism, the likelihood and practicality of major catalysts being assimilated into other proposals in the draft Local Plan and the lack of clarity as to suitable location(s) as within the plan period most of the OPDC built area is SIL or site allocations for housing-led mixed development maximising home numbers. If such catalyst(s) eventually transpired then this Development Management Policy is needed.	Noted. Old Oak and Park Royal is the largest regeneration opportunity in the UK since the Olympics, with the majority of the core developable land in the area in public ownership. It is appropriate to include policies which plan positively for the impact of proposals for catalyst uses.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	39		Strategic Site Allocations Viability Study				STRATEGIC SITE ALLOCATIONS VIABILITY STUDY (SAAVS) 2021 The 2021 SSAVS is fundamental to the deliverability of the PSMDLP as a whole and to crucial parts. Particularly it is relevant to Strategic Policies SP4 Thriving Communities and SP5 Resilient Economy, all Housing policies, as well as to the Delivery and Implementation Chapter. It is also interconnected with the Development Capacity Study, Industrial Land Review and Infrastructure Plan, all of which have been prepared/ updated to support the PSMDLP.	Noted. Please see responses to detailed comments from OONF/ StQW.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	40		Strategic Site Allocations Viability Study				STRATEGIC SITE ALLOCATIONS VIABILITY STUDY (SAAVS) 2021 A critical review forms part of the OONF/ StQW response which concludes that the Plan has not been supported with an adequate evidence base, including the failure to look at the Build to Rent sector, and that it is not viable and deliverable. Most importantly, there is a mismatch between the kind of income streams envisaged in the viability study and likely available infrastructure funding. And that in the ensuing tension between different demands on funds the outcomes will be detrimental to residents (existing and new); that developments will inevitably depart substantially from planning principles. Effectiveness, consistency with national policy and guidance, and general conformity with the 2021 London Plan, and, therefore, soundness have not been demonstrated. The GUA endorses this critique.	Noted. Please see responses to detailed comments from OONF/ StQW.	N	

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40	Community / interest group	Robin	Brown	Grand Union Alliance	41		Infrastructure Delivery Plan				INFRASTRUCTURE DELIVERY PLAN (2021) The OONF/ StQW's response on this supporting study, which is relevant to all policies and chapters of the PSMDLP, is endorsed by the GUA. This statement is to obviate unnecessary duplication.	Noted. See responses provided to OONF/StQWs comments.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	42		Development Capacity Study Update				DEVELOPMENT CAPACITY STUDY UPDATE (2021) This is relevant to several strategic policies and housing supply. Again, the GUA endorses the OONF/ StQW's response.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	43		Tall Buildings Statement Update				TALL BUILDINGS STATEMENT UPDATE (2021) Particularly relevant to Policies SP9 Built Environment and D4 Tall buildings, and on which the OONF/ StQW has responded. The GUA endorses this response.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
40	Community / interest group	Robin	Brown	Grand Union Alliance	44		Duty to Cooperate				DUTY TO COOPERATE This legal requirement has been commented on by OONF/ StQW about which the GUA endorse.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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41	Community / interest group	Melanie	Whitlock	Hammersmith Society	1		Places		P10		<p>We have consistently said 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. However, we do not consider the PSMLP will achieve these goals, nor is it sound.</p> <p>Significant Changes There have been very significant changes since the 2018 version of the Plan. The Car Giant site is no longer available for housing - MM/PS2/OPDC/P2/1. Therefore housing has been shifted to new locations in order to accommodate the same quantum of housing on a reduced area, notably Channel Gate - MM/PS2/OPDC/P9/1 and there is an entirely new Mitre Way Cluster MM/PS2/OPDC/P10C5/1 . These are major changes. We have particular concerns over the new Mitre Way cluster because the height and density will impact on Wormwood Scrubs open space, Scrubs Lane, and northern Hammersmith generally. The consultative material shows views looking northeast from Wormwood Scrubs, and illustrative massing looking south down Scrubs Lane, which emphasise these are major changes. The consultative material refers to Wormwood Scrubs being “framed “by the new developments: the North Acton Cluster is an unwelcome, overcrowded intrusion on the skyline and highlights the weakness of this justification. The massing proposed for Scrubs Lane will add to the constriction of a hitherto open skyline. While the consultative material claims that “most of the Plan remains the same,” changes on this scale show that the 2018 draft has been substantially altered, includes major changes and should be subject to a fresh start.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
41	Community / interest group	Melanie	Whitlock	Hammersmith Society	2		Strategic Policies		SP7		<p>Transport and connectivity The pressure on local transport will be immense and the vehicle connectivity of the Mitre Way Cluster will be problematic. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1: Connectivity, to which we have drawn attention in the past, continues in this draft to remain poor, for Scrubs Lane and more generally. High densities for Scrubs Lane were predicated on the now defunct plan for a Hythe Road station but the densities remain. Access to HS2 and Crossrail is a 10-minute walk on the proposed footbridge. Old Oak station itself will not open for 10 years. The nearest tube stations are Willesden Junction, Kensal Green and White City, between 14 and 20 mins walk away. “New and enhanced bus routes” on Scrubs Lane are referred to in the consultative material, but with already dense local traffic are compromised before they are even introduced. The transport infrastructure does not support the densities proposed for Scrubs Lane. East-west connection between the residential areas on either side of Wormwood Scrubs is not planned for 20 years other than via Harlesden or Du Cane Road. Figure /PS2/OPDC/PM2. This is piecemeal development, not a unified community area coming forward. A new approach is needed to create a coherent, linked development.</p>	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	

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41	Community / interest group	Melanie	Whitlock	Hammersmith Society	3		Strategic Policies		SP9		<p>Significantly changed context to the Plan</p> <p>Overarching grounds for the unsoundness of this PSMDLP are the unique circumstances London and country is in. The pandemic, with continuing rise in infections and new variants, may demand truly long-lasting changes in behaviours and housing. High-density apartment living may become extremely undesirable and there is already a demographic shift to the outskirts of cities. Additionally the continuing Grenfell Inquiry should be in the forefront of the minds of those planning how people will live for the next 20 years. At the densities proposed, with the high-rise they entail, these factors call for serious review of major developments: in this case, a fresh look at the OPDC area and a fresh start to the Plan.</p>	<p>No change proposed.</p> <p>The modifications have been proposed in response to the Planning Inspector's Interim Findings and to ensure general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets. The modifications ensure that OPDC can help meet local and London housing needs, including affordable housing. The Secretary of State for Housing, Communities and Local Government's December 2020 Ministerial Statement on housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs which if anything, points to an increased need for housing since OPDC submitted its Local Plan. Notwithstanding this, Government requires that Local Plans are reviewed within 5 years of adoption and housing needs would be picked up within this review, at which point, the impacts of the Covid pandemic on housing needs will be clearer.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment</p>	N	
41	Community / interest group	Melanie	Whitlock	Hammersmith Society	4		Spatial Vision				<p>Cultural Vision</p> <p>Finally, we record our acute disappointment that early plans for a major cultural attractor have simply disappeared. Indeed, with the densities planned there seems no room for any such enhancement of the area.</p> <p>In 2018 we said:</p> <p>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. While we welcome the references to supporting the existing artists' studios, cultural provision is largely envisaged as an add-on to larger individual development proposals, and it is intensely disappointing that the ambitious earlier vision for culture has been lost.</p> <p>It is our view that this version of the Draft Plan is not sound and it should be withdrawn and a new plan started that takes account of the major changes in land availability and the national and London context.</p>	<p>No change proposed. OPDC considers the proposed modifications have been positively prepared. Local Plan policies TCC4 and TCC7 continue to provide guidance to support and manage the delivery of the cultural offer and catalyst uses in the OPDC area. Policy TCC4 supports the retention of existing, and the provision of new, artist studios.</p>	N	

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42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high-density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	

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42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. he proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The proposed modifications relating to the updated location of portions of the Old Oak Major Town Centre are considered to be justified and effective.</p> <p>Policy SP6 defines the proposed town centre hierarchy. The Local Plan and proposed modifications are clear in the distinction between the Old Oak Major Town Centre and North Acton Neighbourhood Town Centre. Further guidance is provided for portions of the major town centre within the Places Chapter.</p> <p>The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
42	Local Resident	Heun Wee Koo and Yu-Lan Hsu	Heun Wee Koo and Yu-Lan Hsu		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. he proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrated how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
43	Statutory Consultee	Edward	Winter	Historic England	1		General	General			<p>Our advice is based on how the MM affect our previous comments and whether we need to make any new comments, due to the MM.</p>	Noted.	N	
43	Statutory Consultee	Edward	Winter	Historic England	2		Strategic Policies		SP9		<p>No changes have been made that would affect our previous comments.</p>	Noted.	N	

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43	Statutory Consultee	Edward	Winter	Historic England	3		Places		P2		We did not comment on this policy previously. While the substance of the policy has changed significantly, we still do not wish to make comment.	Noted.	N	
43	Statutory Consultee	Edward	Winter	Historic England	4		Places		P7		We did not comment on this policy previously and we do not wish to comment now.	Noted.	N	
43	Statutory Consultee	Edward	Winter	Historic England	5		Places		P9		We did not comment on this policy previously. While the substance of the policy has changed significantly, we still do not wish to make comment.	Noted.	N	

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43	Statutory Consultee	Edward	Winter	Historic England	6		Places		P10		In our July 2018 comments, we raised concerns about tall buildings in this area. In particular, we highlighted the need to avoid a wall of development in this area. The two additional sites identified as suitable of tall buildings can only serve to intensify our concerns in this respect.	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p>	N	
43	Statutory Consultee	Edward	Winter	Historic England	7		Design		D4		No changes have been made that would affect our previous comments.	Noted.	N	
43	Statutory Consultee	Edward	Winter	Historic England	8		Design		D7		The MM propose to delete previous clauses c & d and some consequential changes. Clauses c & d set out a sequential approach that should be taken in respect of development affecting non-designated heritage assets and key elements required in a heritage impact assessment. This information can be found elsewhere in planning guidance such as that produced by Historic England. However, elevating this information to a local plan policy would have made it more visible to applicants and therefore more likely for it to be incorporated into applications. Notwithstanding this, we have no objection to the modifications on the basis of soundness.	Noted. This proposed modification was developed and agreed with Historic England. This is evidenced in a Statement of Common Ground with Historic England (OPDC-SOCG-002).	N	

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43	Statutory Consultee	Edward	Winter	Historic England	9		Design			D7	In the previous iteration of the plan, two new conservation areas were proposed, at St Leonards Road and Grand Union Canal (west of the exiting one). We understand that these proposed conservation areas do not form part of the current version, as there is the possibility that boundaries could change. Conservation areas can be introduced outside the local plan process, and therefore this should not unduly delay the potential designation of these area and therefore, we do not raise any concern in this respect. However, we note that, in paragraph 4.83, there is recognition of the potential for a new conservation area to be known as St Leonards Road. There is currently no similar recognition in respect of the Grand Union Canal conservation area. For consistency, we recommend that OPDC considers introducing a similar paragraph for the potential conservation area at Grand Union Canal.	No change proposed. OPDC's Heritage Strategy identifies potential new and amended conservation area designations. OPDC will be taking these forward in due course.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	1		General	General			Imperial acknowledge that the new Local Plan will set out the vision and framework for how the OPDC area will develop over time, guiding growth in the area through planning policy for the next 20 years. It is acknowledged that the Plan has already undergone a significant amount of consultation in 2017 – 2018 when the Plan was first published and amended. It is understood that the Plan was examined in 2019 at Public Hearing, but that whilst the majority of the Plan was deemed sound, its reliance on two unviable sites led to the Inspectors recommendation for modifications to the Plan before it could be adopted.	Noted.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	2		General	General			It is acknowledged that the OPDC engaged with key landowners, stakeholders and the community in late 2020 to help identify some new sites for housing development whilst protecting others for employment intensification. Imperial are grateful to have been part of these discussions, particularly with regard to the Imperials land holdings within North Acton.	Noted.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	3		General	General			Imperial College London commend the OPDC in their aspirations for the area. Imperial, like others, are keen to see a formal planning policy framework adopted which is pro-growth and builds upon the unique history, existing positive features, and potential opportunities of this part of London. With assets in the area, Imperial are particularly attuned to the challenges that the OPDC face in terms housing and job requirements, restricted connectivity, limited open space and poor public realm. The College believes that the draft Local Plan takes significant strides to tackle these concerns, albeit there are some elements which Imperial believe have been overlooked and that greater thought to specific policies is still required.	Noted.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	4		Places		P1 g)		Imperial support the retention of this policy and specifically the addition of the particular focus on an all modes route and a walking and cycling route from Old Oak Common Station to Scrubs Lane. It is anticipated that the route through from the HS2 station down to White City and Hammersmith Hospital will be highly trafficked. This proposed route through will aid in providing an enhanced connection between this major infrastructure and the new residents, businesses, medical and educational facilities of the two campuses.	Noted.	N	

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44	Land owner	Charlotte	Orrell	Imperial College London	5		Places		P1 g)		The proposed connection is detailed within the OPDC Infrastructure Delivery Plan (IDP) (2021) as route TP16. The Plan notes that the provision of this route is 'necessary', which Imperial are in agreement with, however the Plan states that the route is anticipated to be delivered within the next 11 – 20 years. With Old Oak Common Station due for completion in 2026, we strongly advise that the proposed route is brought forward within OPDC's IDP period to better align with the completion of the station in the next 5 years. Taking into account the above, we provide the following policy recommendations: Route TP16 within the OPDC IDP (2021) to be revised for delivery within the next 0 – 10 years.	No change proposed. The phasing for project TP16 reflects the updated delivery programme of the Old Oak Common Station and associated works undertaken by HS2.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	6		Places		P1 g)		Imperial understand that initial proposals to include a bridge and related routes (TP10 – 12 of the IDP) from Old Oak Street connecting the station to Wormwood Scrubs can no longer be realised due to the retention of SIL land in Old Oak North. The removal of this connection is disappointing, and will subsequently retain a barrier between Old Oak South and the significant open space of Wormwood Scrubs. North Acton, which is currently impacted by a lack of green and open space, will thereby continue to be isolated from Wormwood Scrubs, which is currently only accessible via a number of long, dangerous and unpleasant routes which are understandably, underutilised by residents and occupiers of North Acton. The removal of the proposed links also eradicates a potential enhanced route through from North Acton, across Wormwood Scrubs and on to Hammersmith Hospital and Imperial's White City Campus. It is not clear that further investigation into possible alternative links have been fully explored. Imperial thereby request that this work is undertaken or existing research set out to justify an absence of connections in this location. Taking into account the above, we provide the following policy recommendations: Routes TP10, TP11 and TP12 within the OPDC IDP (2021) should be revisited and brought back into the plan period. Where this is challenging, further routes to connect Old Oak south to Wormwood Scrubs should be explored before the adoption of the Plan.	No change proposed. The Local Plan and Infrastructure Delivery Plan continue to include plans for a series of new connections to Wormwood Scrubs to its north from Old Oak Common station. Wormwood Scrubs will continue to be accessible from Old Oak Common Lane, and this route has been identified in the Infrastructure Delivery Plan to be upgraded to provide an improved connection for pedestrians and cyclists.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	7		Places		P1 i)	4.18	Imperial support this policy and acknowledge that the Old Oak South Local Park can in time form part of a connection with green spaces in North Acton. We recommend however, that the strong policy wording to provide this park is reflected within the accompanying sub text to the policy. Paragraph 4.18 refers to the 'potential to explore the delivery of an additional Local Park in Old Oak South'. We therefore suggest that the word 'potential' is removed to align with policy wording. Paragraph 4.18 – Wording should be edited to the following: 'In the long term there is also the potential to explore the delivery of the area should deliver an additional Local Park in Old Oak South through the release of the Elizabeth Line Depot for development if demonstrated to be feasible '.	No change proposed. The Elizabeth line depot is identified to be delivered after the plan period. OPDC considers the proposed modification is effective in reflecting the longer term development of the Elizabeth line depot.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	8		Places		P2 b)		Imperial support the addition of the new policy for Old Oak North, particularly in terms of the proposed enhancements to the Grand Union Canal. Existing routes from North Acton, along the Grand Union Canal and through to Scrubs Lane are currently underutilised due to lack of lighting, indirect connection and previous criminal behaviour experienced by users along these routes. As a result, the existing routes are not utilised by the residents, occupiers and students within North Acton, instead forcing large numbers to travel via the London Underground, putting huge pressure on North Acton station in particular. Policy P2 b) which seeks to improve wayfinding, signage, lighting to/from Wilesden Junction, Scrubs Lane and the Grand Union Canal, in addition to ensuring that the public realm is activated along the canal, is thereby strongly supported by the College.	Noted. Policy P3 covers the Grand Union Canal place and it sets out a range of provisions to enhance the canal. Policy P2 works alongside this to ensure improved access to and over the canal within Old Oak North.	N	

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44	Land owner	Charlotte	Orrell	Imperial College London	9A		Places		P7 d)		A. It is acknowledged that a number of minor amendments have been made to Policy P7 to reflect a change in the Use Class Order since 1st September 2020. Imperial believe that these alterations do not go far enough in terms of land use strategy for North Acton and fail to futureproof the area to accommodate expansion of specialist land uses or new real estate models. Specifically, Policy P7 (d) fails to acknowledge changing ways of teaching, working and collaborating which are a key part of innovation hubs and tech centres within town centres, in addition to life science hubs which have clearly demonstrated their success in places such as White City. The policy should be amended to overcome the inherent barriers and limitations arising from the separation of Commercial, Research & Development and Medical land uses (Use Class E) from higher educational and specialist education uses (Use Class F1).The policy should seek to bridge this disconnect to allow for the provision of new and adaption of existing spaces for innovation centres or incubators, where education, research & development, start-ups and SMEs can flexibility mix within the town centre and within the same building without being of the scale to fall under Policy TCC7 for Catalyst Uses. Without a supportive policy, Imperial believe this will clearly limit the opportunity for North Acton to have a key position within the 'West Tech Arc' and fail to provide a synergy between places such as Park Royal and town centres such as North Acton. Policy P7 d) should be re-worded to the following: 'Focusing town centre, social infrastructure, <u>research and development, educational</u> , cultural and catalyst uses and Use Class E uses that are appropriately designed and serviced to support the North Acton Neighbourhood Town Centre within the town centre and along Old Oak Street.	No change proposed. The current policy basis is considered sufficient to determine such proposals. Policy P7ciii provides support for non-residential uses at ground level and site allocations within North Acton also have economic floorspace targets and flexibility within this for non-residential floorspace to comprise of a mix of land uses. Larger proposals would also be considered in relation to policy TCC7 on catalyst uses.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	9B		Places		P7 d)		B. An additional policy should be added after d) which states: <u>'Supporting creative and academic based industries, major research and academic hubs across North Acton'</u>	No change proposed. The current policy basis is considered sufficient to determine such proposals. Policy P7ciii provides support for non-residential uses at ground level and site allocations within North Acton also have economic floorspace targets and flexibility within this for non-residential floorspace to comprise of a mix of land uses. Larger proposals would also be considered in relation to policy TCC7 on catalyst uses.	N	

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44	Land owner	Charlotte	Orrell	Imperial College London	10		Places		P7 f) h)		Policies P7 f) and h) note that proposals should contribute to and / or enable delivery of a permeable, inclusive and accessible street network with new connections to surrounding areas as shown in Figure 4.21. These policies have a specific walking and cycling focus along Portal Way, Old Oak Street, Jenner Avenue and through North Acton Station. Imperial are acutely aware of the poor public realm, priority of vehicular traffic and inadequate pedestrian and cycle networks within North Acton. Through discussions with the OPDC and LB Ealing, it is acknowledged that North Acton requires significant gyratory improvements and enhancements to the user experience to provide a safe and inviting space for all. Whilst Imperial support Policy P7 f) and h), it isn't believed that the policy goes far enough to address vehicular movements and the current convoluted highway network in North Acton. North Acton has already witnessed significant redevelopment and as such, there will be a limited number of developments coming forward in which to finance large-scale infrastructure improvements outside of their red lines. Whilst it is acknowledged that one development alone cannot finance the required improvements, the success of North Acton as a neighbourhood town centre is reliant on a safe and user-friendly environment. On this basis, wider gyratory and vehicular improvements should be incorporate within the policy and IDP (2021) as a priority in order to aid the OPDC to gain external funding to provide the necessary improvements to realise the wider strategic policy of North Acton. Policy P7 f) should be re-worded to the following: 'Contributing to and/or enabling delivery of a permeable, inclusive and accessible street network with new connections to surrounding areas as shown in figure 4.21 including Old Oak Street west of the potential Old Oak Common Lane Station, <u>and the pedestrian and cycle bridge across the Central Line to connect Victoria Estate to Brunel Road.</u>	No change proposed. The pedestrian/ cycle bridge across Central Line to connect Victoria Estate to Brunel Road has been identified as a potential option to increase connectivity between North Acton and Wormwood Scrubs and will be safeguarded for future delivery. However, this project is not considered necessary to support homes and jobs identified in the Local Plan and therefore is not referenced in Policy P7 f).	N	
44	Land owner	Charlotte	Orrell	Imperial College London	11		Places		P7 g)		Policy P7 g) should be re-worded to the following: 'Contributing to and/or enabling improvements to the Victoria Road and Wales Farm Road <u>North Acton</u> highways network as key movement routes for walking, cycling, buses and vehicular traffic.during construction and operational phases'	No change proposed. Policy P7 g) refers to improvements along Victoria Road and Wales Farm Road. It is not considered necessary of appropriate to widen the scope of this as revised plans for the gyratory have not been progressed as part of the main modifications in response to OPDC's Planning Inspector's Interim Findings.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	12		Places		P7 h)		Imperial are disappointed that a pedestrian and cycle connection through to Wormwood Scrubs is not specifically acknowledged within Policy 7 h), despite its significance as a green space within the OPDC boundary and role the site could play in providing greater open space for residents of North Acton. Although Wormwood Scrubs lies only 500m from North Acton, this journey currently takes around 30 minutes due to the lack of direct connectivity. This route is via unsafe, poorly lit paths via the existing canal or heavily trafficked routes such as the A40 which leads to unsafe journeys, particularly for children. It is understood, that both residents and students who live within the North Acton area therefore do not currently travel the 30 minutes to Wormwood Scrubs, choosing to walk to significantly smaller Acton Cemetery.	No change proposed. The pedestrian/ cycle bridge across Central Line to connect Victoria Estate to Brunel Road has been identified as a potential option to increase connectivity between North Acton and Wormwood Scrubs and will be safeguarded for future delivery. However, this project is not considered necessary to support homes and jobs identified in the Local Plan. The Infrastructure Delivery Plan identifies investments to improve the walking and cycling conditions to Wormwood Scrubs via the new Old Oak Street and Old Oak Common Lane.	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
44	Land owner	Charlotte	Orrell	Imperial College London	13		Infrastructure Delivery Plan				The accompanying IDP (2021) does note that a route (TP22) across the Central Line to connect Victoria Road to Brunel Road (thereby connecting to Wormwood Scrubs) would be desirable. At current, the IDP notes that the OPDC are not committed to this route, but that it could come forward within the next 11-20 years. Imperial strongly support this proposed route and the ability for the link to both provide access to a significant area of open space, but also to provide improved connectivity through to Wormwood Scrubs and beyond to Hammersmith Hospital, Scrubs Lane and White City. Taking into account that the proposed connection points to the north of Wormwood Scrubs (within Old Oak South) have been removed, the importance of route TP22 to connect east to west across OPDC through Wormwood Scrubs has become even more important. On this basis, Imperial feel strongly that this route should be categorised as 'necessary' within the IDP (2021), be brought forward within the Plan period to better align with the completion of numerous high density developments in North Acton and for this route to be specifically reflected within policy wording. Imperial also believe that this route should be provided in conjunction with significant improvements to existing canal routes through the area to ensure that these linkages can become safe, encouraging walking rather than the reliance on public transport, particularly North Acton underground station. Route TP22 within the OPDC IDP (2021) to be re-categorised as 'necessary' and revised for delivery within the next 0 – 10 years.	No change proposed. OPDC will support proposals which enable project TP22 to be delivered, and will proactively work with key stakeholders to deliver the link. However, the project is currently identified as desirable and is not considered necessary to support development due to the alternative links that are available and the policy requirement for individual development sites to deliver 30% public open space and thus ensure that developments provide suitable public open space provision on-site. The landlocked substation sites which are required to deliver the TP22 link will be required by HS2 to support construction of Old Oak Common Station, and not likely to be available to help deliver the project within the 0-10 year time period.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	14		Places			P7 vision	An addition to the Policy area Vision. Specifically: 'North Acton and Acton Wells will be a high density mixed use area accommodating tall buildings in appropriate locations. An improved street and highways network will provide a choice of greened routes to Old Oak, Park Royal and West Acton and provide a safe and user-friendly environment around the town centre . A new neighbourhood town centre will sit within a high quality and coordinated public realm along Victoria Road and Portal Way. Old Oak major town centre will connect to an enhanced North Acton station delivering a range of active uses.'	No change proposed. Modifications to the North Acton and Acton Wells Vision were not proposed in response to the inspector's interim findings or other directions. OPDC considers the vision is sound. The suggested amendments would be managed through existing Local Plan and 2021 London Plan transport policies.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	15		Places			P7C1 a)	Imperial support the retention of North Acton as a Town Centre Cluster and acknowledge the importance of encouraging a range of permanent and meanwhile uses within the area. As per Policy P7, a small number of minor amendments have been made to the Policy, most notably to reflect the change in Use Class Order since 1st September 2020. Similarly to Policy P7, Imperial believe that these alterations do not go far enough in terms of land use strategy for North Acton in failing to acknowledge changing ways of teaching, working and collaborating which are a key part of innovation hubs and tech centres within town centres. This policy should also be amended to overcome the inherent barriers and limitations arising from the separation of Commercial, Research & Development and Medical land uses (Use Class E) from higher educational and specialist education uses (Use Class F1). An alteration in policy would allow for North Acton town centre to become futureproofed, both to the changing nature of town centres, but also to allow North Acton to bridge the gap and build upon the benefits of Park Royal. Taking into account the above, we provide the following policy recommendation: Policy P7C1 a) should be re-worded to the following: "The delivery of a neighbourhood town centre by clustering a range of permanent and meanwhile town centre uses and Use Class E and F uses that are appropriately designed and serviced to support the town centre around the existing southern and new northern station squares along Victoria Road south of North Acton Station and along Portal Way with residential above'.	No change proposed. The current policy basis is considered sufficient to determine such proposals. Policy P7ciii provides support for non-residential uses at ground level and site allocations within North Acton also have economic floorspace targets and flexibility within this for non-residential floorspace to comprise of a mix of land uses. Larger proposals would also be considered in relation to policy TCC7 on catalyst uses.	N	

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44	Land owner	Charlotte	Orrell	Imperial College London	16A		Strategic Policies		Table 3.1		A. Imperial welcome the inclusion of 1 Portal Way as a Site Allocation within the OPDC Local Plan. Imperial also support the retention of Policy SP10 b) which requires that Site Allocation home and non-residential floorspace targets should be met or exceeded. 1 Portal Way currently benefits from an extant planning permission for a mixed-use development of 764 homes and flexible commercial space, granted by LB Ealing on 8th August 2016 (LPA Ref: P/2015/0095). Since planning permission was granted, Imperial have acquired the Site and have been exploring alternative proposals which will further enhance the Site, better respond to the emerging local context and better meet the needs of North Acton. The character of North Acton has changed significantly since planning permission was granted in 2016 and the proposed scheme seeks to reflect that. Imperial commenced pre-application discussions on a revised scheme for the site in March 2021 and has two Planning Performance Agreements in place, one with the OPDC and one with LB Ealing, with a target submission date of October 2021. The current proposals include the demolition of existing building and redevelopment of the site to provide c.1,300 – 1,600 residential dwellings (including Built to Rent (BtR) and 'traditional' C3), potential for co-living and hotel uses, a flexible mix of commercial/community uses of 18,000 – 23,000 sqm of floorspace including significant office space, alongside new public realm and amenity spaces. 1 Portal Way was included as a Site Allocation as part of the revisions made to the Local Plan since Inspector comments in 2019. At the time, the proposed scheme at 1 Portal Way was in its infancy with pre-application discussions only commencing in March 2021. On this basis, it was deemed most appropriate to utilise the extant permission to guide the Site Allocation target housing and commercial floorspace figures. Since then, the scheme has been part of 9 pre-application meetings with both the OPDC and LB Ealing, one Greater London Authority pre-application meeting, two Design Review Panels, one Community Review Group and significant engagement, including its first formal public consultation. The scheme has largely been received positively and as a result of these discussions, the general principles of the scheme are nearing agreement.	Noted.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	16B		Strategic Policies		Table 3.1		B. On this basis, Imperial strongly recommend that the Site Allocation figures afforded to 1 Portal Way are amended to reflect the revised proposals to the site, in addition to the changing context and character of North Acton since the 2016 permission. To aid the OPDC in considering amendments to the site allocation, the following provides potential amendments in line with recent pre-application discussions with the OPDC, LB Ealing and Greater London Authority: net additional units first 10 years- 1,300, min commercial/industrial floorspace over plan period- 18,000, new jobs over plan period 1.500	No change proposed. Housing capacities for sites are defined in the Development Capacity Study (DCS) Update based on the methodology set out in the DCS. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The site allocation capacity is derived from the extant planning permission. Table 3.1 identifies that site allocation housing capacities are minimums. Should a proposal seek to increase the housing capacity, this will be determined using relevant development plan policies and material considerations.	N	

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44	Land owner	Charlotte	Orrell	Imperial College London	17		Places		P10		Imperial welcome the increased importance placed on Scrubs Lane as a hinge between surrounding neighbourhoods and as a connector between Old Oak North and the Old Oak Common Station to White City in the south. It is however disappointing that Policy P10 removes the east – west connection along Wormwood Scrubs Street (TV10 of the IDP (2021)) in addition to the linkages between TV10 up to Old Oak South (TP10 – 12 of the IDP (2021)) as noted regarding Policy 1. It is acknowledged that the land forming Wormwood Scrubs Street will now be 'safeguarded' rather than delivered within the plan period. North Acton. As previously highlighted, existing routes from North Acton through to the Scrubs and beyond to Scrubs Lane are underutilised due to lack of lighting, indirect connection and previous criminal behaviour experienced by users along these routes. As a result, the existing routes are not utilised by the residents, occupiers and students within North Acton, instead forcing large numbers to utilise the underground network at North Acton. Policy P10 e) v. – Wording should be edited to the following: 'Improving existing, safeguarding for and creating new east–west routes at each cluster and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak South, the Grand Union Canal, St. Mary's Cemetery and Kensal Canalside Opportunity Area;	No change proposed. For clarity, Wormwood Scrub Street was identified to be delivered after the plan period in the submission Local Plan. The accelerated delivery of the North Pole East Depot has enabled the eastern portion of Wormwood Scrubs Street to be identified to be delivered in the plan period. The western portion continues to be identified for delivery after the plan period. Therefore, it is appropriate to continue to refer to safeguarding for this route. The Local Plan continues to provide policies for delivering high quality, safe and green public realm to support local connectivity and legibility.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	18		Infrastructure Delivery Plan				Imperial understand that initial proposals to include a bridge and related routes (TP10 – 12 of the IDP) from Old Oak Street connecting the station to Wormwood Scrubs can no longer be realised due to the retention of SIL land in Old Oak North. The removal of this connection however is disappointing, and will subsequently retain a barrier between Old Oak South and the significant open space of Wormwood Scrubs. The removal of the proposed links also eradicates a potential enhanced route through from North Acton, across Wormwood Scrubs, along Wormwood Scrubs Street and on to Hammersmith Hospital and Imperial's White City Campus. It is not clear that further investigation into possible alternative links have been fully explored to connect in to the proposed Wormwood Scrubs Street. Imperial thereby request that this work is undertaken or existing research set out to justify an absence of connections in this location. Taking into account the above, we provide the following policy recommendations: Route TV10 within the OPDC IDP (2021) to be revised for delivery within the next 0 – 10 years. Routes TP10, TP11 and TP12 within the OPDC IDP (2021) should be revisited and brought back into the plan period if possible. Where this is challenging, further routes to connect Old Oak south to Wormwood Scrubs or Wormwood Scrubs Street should be explored before the adoption of the Plan.	No change proposed. Wormwood Scrubs Street (TV10) has been identified for delivery on the International Express Depot site. OPDC's Development Capacity Study (DCS) has identified that this site will not be available for development within the plan period. As such, it is not possible for the street to be delivered in the 0-10 year period. As a result, it also not possible to deliver pedestrian and cycle links TP10-TP12, however passive provision for these routes is being secured through the development of Old Oak Common Station, and they have been identified in Local Plan for Place Policies P1 and P12. OPDC is working with HS2 to develop proposals for a eastern station link which will connect Old Oak Street to the Grand Union Canal towpath and onward to Scrubs Lane. This project has been identified as necessary in the IDP (TP8) and for delivery in the 11-20 year phase, in line with delivery of Old Oak Common station. OPDC is also working with the London Borough of Hammersmith and Fulham on developing proposals for improvements to Wormwood Scrubs, which will help to inform how walking and cycle routes across the Scrubs may be delivered.	N	

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44	Land owner	Charlotte	Orrell	Imperial College London	19A		Places		P12		Support the continued protection of Wormwood Scrubs as a publicly accessible open space, important ecological asset and a protected area of Metropolitan Open Land. Imperial agree that new sensitive connections should be incorporated to both improve connections through to Old Oak and White City and to make the Scrubs more accessible to locals and Londoners. The College is supportive of the revision to the Policy, particularly those which look to protect and enhance existing sports pitches within the Scrubs. Whilst Imperial commend the continued aspiration to improve access to the Scrubs both toward and across the open space, the policy relies upon routes contained within the IDP (2021). As noted above, many of the proposed routes to the north and west of Wormwood Scrubs, notably TP 10 – 12 to the north of Wormwood Scrubs and TP 22 connecting Victoria Estate to Brunel Road have been categorised as 'not committed' and delivered at the end, or after the Plan period. As a result, Policy P12 fails to address connection improvements from the west of Wormwood Scrubs from North Acton, through to the Scrubs and on to Scrubs Street, Hammersmith Hospital and White City. Whilst it is understood that Wormwood Scrubs should be protected as an ecological asset, the current open space is underutilised due to a lack of formalised cycling and pedestrian routes through the site. Imperial believe that sensitively designed formal routes should be accounted for as part of Policy P12 which will aid in attracting users to connect through and travel to the Scrubs.	No change proposed. This is not something that OPDC has been requested to modify by the Inspector. Notwithstanding this, Policy P12 (g, ii) requires proposals to contribute towards routes, that are designed to accommodate current and future levels of usage, across, to and from Wormwood Scrubs to the surrounding area. Key walking and cycling routes are identified at paragraph 4.234 and in figure 4.45. However, as noted paragraph 4.234, as development proceeds, there may be a need for additional or alternative locations/alignments for these accesses. OPDC is working with the London Borough of Hammersmith and Fulham on developing proposals for improvements to Wormwood Scrubs, which will help to inform how walking and cycle routes across the Scrubs may be delivered. The Policy does not rely upon routes contained within the IDP as the IDP does not identify specific routes across the scrubs. As further work is undertaken enhancements to the Scrubs, these will be reflected in future updates to the IDP.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	19B		Places		P12		It is disappointing that the proposed redevelopment of the Linford Christie Stadium is not accounted for within supporting text to Policy P12. Whilst overdue, it is expected that the LB of Hammersmith and Fulham will be commencing a tender process for the site imminently. Initial technical analysis and feasibility reviews have indicated that a large scale events space could be supported on the site. Whilst in its infancy, proposals for the site have the potential to significantly increase footfall across Wormwood Scrubs to Old Oak Common Station and North Acton. The need to provide formalised pedestrian and cycle access across the Scrubs in order to protect the asset will be heightened and should be reflected within Policy sub-text. Taking into account the above, we provide the following policy recommendations: An addition to the Policy area Vision. Specifically: 'Wormwood Scrubs will continue to be a cherished publicly accessible open space, important ecological asset and a protected area of Metropolitan Open Land. New sensitive connections to the north and east west and across the Scrubs alongside carefully considered improvements will bring Old Oak and White City closer together making the Scrubs more accessible to locals and Londoners. Policy P12 g) – Wording should be edited to the following: 'Improving access to and connections across Wormwood Scrubs for all Londoners by ensuring development contributes to new and improved sensitive walking and cycling:	No change proposed. Linford Christie Stadium is located outside of the OPDC area and there are no firm plans at this point in time for the redevelopment of the stadium. OPDC will work with the London Borough of Hammersmith and Fulham on how the impacts of the Scrubs from any development proposals on the stadium site may be addressed through a management plan that they are development, and as part of overall proposals for sensitive enhancements to the Scrubs. Policy P12 (g, ii) requires proposals to contribute towards routes, that are designed to accommodate current and future levels of usage, across, to and from Wormwood Scrubs to the surrounding area.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	20		Transport		T4		Imperial continue to support the provision of car parking for non- residential developments where this can be justified where demonstrated by operational or business needs.	Noted.	N	

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44	Land owner	Charlotte	Orrell	Imperial College London	21		Housing		H2		The current policy fails to acknowledge the important role that key worker accommodation plays in providing affordable housing for essential workers and for institutions such as Imperial to attract and retain staff in London. Policy H2 should specifically acknowledge key worker accommodation as an affordable provision within the new Local Plan and an appropriate multi-use alongside student accommodation and co-living accommodation.	No change proposed. In accordance with the 2021 London Plan, Policy H2 sets out the affordable housing tenures supported by the Mayor. Co-living is not considered to be an affordable housing product and student accommodation has separate affordable student housing requirements as set out in Policy H10. However, modification MINOR/ 2/H2/1 does recognise the opportunity to deliver social/Affordable Rent, London Living Rent and Shared Ownership homes that can meet the needs of London's essential workers who maintain the function and resilience of the city, such as those working in health, fire, police, transport and support services.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	22		Employment		E1		Imperial support the revised focus on floorspace capacity, rather than square meterage (Policy E1 b)) and the intensification of industrial land when considering the redevelopment of Strategic Industrial Land.	Noted. OPDC is seeking to achieve a no net loss of industrial floorspace capacity. The Industrial Land Review Addendum demonstrates that development in the OPDC area could deliver a net gain of 250,428sqm of industrial floorspace, this is measured on a square meterage basis. This can be achieved through industrial intensification (increasing industrial floorspace) on sites within the Strategic Industrial Location (SIL) and co-location of industrial uses on site outside of SIL.	N	
44	Land owner	Charlotte	Orrell	Imperial College London	23		Town Centre and Community Uses		TCC7		Imperial support the aspiration of the OPDC by including Policy TCC7 on Catalyst Uses and commend the OPDC in supporting large scale facilities which could define parts of the OPDC. The OPDC should be cautious however about relying upon this Policy to support new real estate models and land uses including innovation centres, tech hubs and life science campuses. Most of these uses fall below the size requirements contained within Policy TCC7 (10,000 sqm / or 0.25 hectares) and therefore would fail to utilise Policy TCC7 falling back to area specific Policy within the OPDC Local Plan. As such, the OPDC should account for these uses within other proposed Policies within the Plan as highlighted within this letter.	Noted. No change proposed. The thresholds for catalyst uses have been identified by OPDC's Catalyst Uses Study, which is the key supporting study to Policy TCC7. OPDC consider that the impact of largescale development proposals which are below these thresholds can be effectively managed through other policies of the Local Plan.	N	
45	Local Resident	Irene Gallagher			1		Strategic Policies		SP4		HIGH RISE HOUSING IS NOT WHAT IS NEEDED OR WANTED VERSION IN 2021 ONWARDS , ESPECIALLY WITH ALL THE CLADDING SCANDAL.	No change proposed. There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety. The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.	N	

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45	Local Resident	Irene	Gallagher		2		Strategic Policies		SP7		High Density housing which is car- free does not mean Vehicle Free. Also High Density buildings have great problems getting delivery drivers who also have a job to do delivering food/ items / Pharmacy items, especially with the Pandemic, so there is a lot lot more traffic and deliveries.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.	N	
45	Local Resident	Irene	Gallagher		3		Strategic Policies		SP4		You build these high rise. but what about doctors/schools/Dentists/ Medical Centres Where are they ? - as they are very much needed. Families who move into these High Rise don,t live life, they just exist, I feel so sorry for them.	No change proposed. The Local Plan is supported by a Social Infrastructure Needs Study (SINS), which identifies the social infrastructure necessary to support new development identified in the Plan. The study has identified the capacity that exists in existing social infrastructure facilities to support early years of development, what new facilities are required on-site and when and where they should be delivered.	N	
45	Local Resident	Irene	Gallagher		4		Design		D5		Most of the of the High rise buildings that have been built in this area (North Acton) THEY ARE BIG UGLY AND VERY DARK . THEY ARE HALF EMPTY They could not be called a home they are mainly aimed at students and young people. Since most of these would be transient tenants they would not have any interest in the local area. All there is in one of the high rise, they have there own Bar & Resauaurant . There is a Also of course the oligatory Gym and 2 small shops, there is no other facilites.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The proposed modifications for P7 and P7C1 relating to North Acton are limited and continue to seek high quality high density development and a neighbourhood town centre. The recorded number of long-term empty (6 months or more) homes in London is at an historic low level according to official figures. However, it takes time for new developments to become fully occupied and housing developers and Registered Providers have operational plans to manage this process. For example, there may be legal restrictions within s106 agreements whereby the affordable units can only be fully occupied when a majority of the private units have been occupied or there may be access practicalities meaning that certain blocks are left empty for a short time. There may also be delays in handing over units for occupation. This has been particularly apparent in the past year because of the Covid-19 restrictions. Policy P10 provides guidance to manage student housing.	N	

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45	Local Resident	Irene	Gallagher		5		Town Centre and Community Uses		TCC6		The local pubs we did have are been demolished.	No change proposed. The protection of existing public houses is addressed through Policy TCC7 (Public Houses) of the Local Plan. This Policy sets requirements which must be satisfied for OPDC to consider the loss of an existing pub as part of a proposed development. In summary this includes: - The requirement for the existing public house to be competitively marketed for a period of two years, and for it be clearly demonstrated that the pub is no longer economically viable; - That an assessment is undertaken of the surrounding area to identify facilities which offer similar community benefit to the public house; - The need to consult the community on the value of the public house to demonstrate that its loss doesn't also result in the loss of a valuable community asset.	N	
45	Local Resident	Irene	Gallagher		6	MMPS2/OPDC/SP/19 AND MMPS2/OPDC/SP/14	Strategic Policies		SP6		This 2021 version of the draft , refers at various points to parts of a major town centre The location of Channel Gate for major town centre uses is not convincing. North Acton is now largely redeveloped but attracts only fast food and cafe outlets, Also fighting at week-ends.. Its proof these are Student Accommodation and will do nothing for the local area. MMPS2/OPDC/SP/19 AND MMPS2/OPDC/SP/14 6a.	No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre. The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells. Policy TCC2 controls the location and concentration of hot food takeaways. Policy P10 provides guidance to manage student housing.	N	

45	Local Resident	Irene	Gallagher	7	General	Consultation	<p>I am a long time resident of this area, I go to some of the meetings when I can view plans for the area area, not that I understand them., as I am not a builder.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
45	Local Resident	Irene	Gallagher		8		Strategic Policies		SP4		The Major wants X Number of Homes, but you cannot call these High Rise a Home they are 4 concrete walls.	No change proposed. The Local Plan is required to be in general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets. The Local Plan has policies to secure high quality design and in tandem with the London Plan, sets standards for internal space, private amenity space daylight and sunlight, as well as other factors which ensure that new developments deliver high standards of health and well-being for residents	N	
46	Local Resident	Irene	Lyford		1		Places		P10C5		I wish to object in the strongest terms to the proposed fifth 'cluster' at North Pole Depot. 'Cluster' is in innocuous word, but what it amounts to is even more tall buildings blotting the skyline in this part of west London. This is no 'modification' but a significant addition to the original plans and should be treated as such, with appropriate consultation of local opinion.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

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46	Local Resident	Irene	Lyford		2		General	Delay or withdraw the plan			<p>Why is west London being blighted by the innumerable tall buildings that have already been built, and with more planned? The whole area is being destroyed by these buildings which are devoid of any aesthetic merit - and who knows their use? The pandemic has and is changing the way we live and work in London and until the dust has settled around the new way of living, who knows if there is any need of these buildings - whether they be residential or commercial. Surely the wise thing would be to wait and see what the impact of the pandemic will be, and then look again at a Local Plan.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
46	Local Resident	Irene	Lyford		3		Places			P12	<p>Wormwood Scrubs is a valuable space, not just for wildlife but for people. The pandemic has taught us to re-think our relationship with nature and it seems wholly inappropriate at this time to be destroying this area with what have been open skylines which should be treasured as the resource they are - not destroyed through greed and lack of forethought.</p> <p>Pleas stop and think again.</p>	<p>No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The assessment of the impacts of tall buildings undertaken as part of the Scrubs Lane Development Framework update has found that there is no increased impact on Wormwood Scrubs as a result of the proposed modifications.</p>	N	

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47	Local Resident	Isabel	Fernandez		1		General	Delay or withdraw the plan			I am a resident within the old oak area and am writing to object to changes to the OPDC local plan. I feel that this is not an appropriate time for such significant changes to be considered, with the ongoing pandemic, and there has not been sufficient consultation on the contents. We require more detail and more time to be able to consider such a substantial change.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
47	Local Resident	Isabel	Fernandez		2		General	Consultation			I am particularly concerned as a close neighbour of the channel gate road site that the plans for this site are unclear and have not been consulted on in any detail.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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47	Local Resident	Isabel	Fernandez		3		General	Support for community group comments			I support the representations from the Old Oak Neighbourhood forum.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
48	Local Resident	Isabel	Langtry		1		Town Centre and Community Uses		TCC4		I would be grateful as an international local artist to have public art incorporated into the plan. A public piazza with sculptures that can be touched, a sculpture trail and or high quality sculptural/architectonic pieces that would enhance and make accessible the more hard landscaped areas. Elements that also reflect the beautiful potential of the water element in the development. I would be happy to show you examples of sculptural works that would work well in the development.	Noted. No change proposed. Policy TCC4 sets out how OPDC will support proposals for public art, and will seek to ensure that development either incorporates public art to contributes to its delivery in the local area. As a delivery agency, OPDC is proactively supporting public art initiatives in the local area, most notably through our "In the Making" programme which is delivering a series of ambitious art commissions involving local people.	N	
49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	1		General	Delay or withdraw the plan			The island triangle residents' association (TITRA) believes that the March 2021 version of the Draft Plan shows clear signs of being rushed and is not sound. It will not lead to a successful and sustainable new Old Oak area. We think there are important reasons for the OPDC to take more time to develop a new Local Plan, which are as follows:	No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. We consider that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. New and updated supporting studies have been developed to inform the proposed modifications as part of the plan led approach.	N	

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49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	2		General	Delay or withdraw the plan			<p>Flawed assumptions by OPDC post pandemic - high rise building as the key to town centres: We think the plan rests on some flawed and outdated assumptions about the economy, transport and social trends. First, the OPDC is trying to get current draft plan approved during the pandemic, there have been huge changes in London's population, its workforce with people still actively seeking new ways of working and living – examples include people using including new types of coworking sites or shared offices, rather than accepting that work is done in big offices.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	3		Design		D4		<p>Second, the plan assumes the high-rise buildings are the answers to delivering on the plan's ambitious housing targets. But post-Grenfell, do people want to live in high rise buildings anyway when the issue of fire safety still hasn't been sorted - four years after the disaster and many leaseholders of high-rise buildings are out of pocket, or potentially ruined if they cannot sell their properties?</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	4		Spatial Vision				<p>Third, the OPDC is planning to allow some of the highest density housing developments ever seen in Britain - relying on the 'no vehicles for occupiers' principle to make this high risk strategy workable. But since the first version Local Plan was drafted, the idea of having local Overground stations for Old Oak has been dropped, putting more pressure on North Acton and Willesden Junction to handle local transport demand. The pandemic and its aftermath have seen big changes in vehicle ownership. For example, businesses are making a fixture of home delivery for their operations. As reported today (July 5), UK van sales have increased by 76% in 2021 (see below) which will mean increased 24/7 service traffic into high-density housing developments – which call into question the plan's push for such high density development strategies. We question the OPDC's blanket assumptions (seen throughout the draft plan) that high rise housing and offices are what people really want or need in the future..</p>	<p>No change proposed.</p> <p>The Local Plan and Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	5		General	Extent of changes			2. Unsound process – strategic changes to the draft plan are portrayed only as modifications While the OPDC has claimed in its consultation that 'most of the Plan remains the same' as its 2018 draft plan, the actual changes proposed are substantial with entirely new locations - such as Channel Gate / (aka the Willesden Euroterminal Yard post HS2 operations), Atlas Road and Acton Wells' on Victoria Road – being introduced as sites for very high density and high rise housing. Making these changes that will fundamentally change entire neighbourhoods and they require much more detailed explanations and public consultation processes. The associated impacts of these strategic changes have not been fully explained to the local community. Take the example of Policy P9 which proposes new walking and cycling routes throughout the new Channel Gate area including new accesses to Old Oak Lane – in other words, opening the island triangle's existing streets to cycle and pedestrian traffic from 3,100 homes and related industrial sites. This is a strategic change that could redefine the character of Stephenson and Goodhall Streets in the island triangle forever. Such changes to the island triangle needs proper explanation rather than being one extra item on a video call. By pushing through these strategic changes through claiming they are only modifications, the OPDC is not following sound planning process but instead making poorly thought out and over-hasty last minute changes to its plan.	No change proposed. Although the land use proposals have changed for Channel Gate, the Euroline Freight Terminal continues to be safeguarded and the principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. The development capacity of Acton Wells has been able to be increased as land is no longer required to deliver a secondary school and land is no longer required to be safeguarded for the Crossrail Spur.	N	
49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	6		Strategic Policies		SP7		3. Inadequate "connectivity" / transport links to support new housing areas: Throughout the draft plan, the OPDC claims that these new housing locations earmarked for Channel Gate (the Willesden Euroterminal Yard) and Victoria Road will be "well connected" but since the idea of Overground stations for Old Oak has now been abandoned, these locations will not have adequate public transport. The A4000 Old Oak Lane Victoria Road is already badly affected by traffic from HS2's works and will be disadvantaged for a decade, so even putting on additional bus services in the meantime before HS2 is completed will not resolve these problems.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	

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49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	7		Strategic Policies		SP6		<p>4. Unconvincing argument that Channel Gate can be part of a North Acton town centre The OPDC's 2021 Draft Local Plan version talks about the Channel Gate enclave being part or the site for 'major town centre uses' – which is a misguided idea, for three main reasons: First, residents note that the existing North Acton area surrounded by the Gypsy Corner is characterised by high rise student accommodation with retail units at ground level for students and people using North Acton Tube station – it is stretching the truth to say it is a functioning town centreor that it has anything whatsoever in common with the Channel Gate Road, as the OPDC claims in this draft plan.</p>	<p>No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p>	N	
49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	8		Places		P9		<p>Second, putting high density and high rise buildings on the Channel Gate area (centred on the Willesden Euroterminal Yard) – with 40-60 storey structures at the centre to hit the wildly ambitious 3,100 homes target set for this enclave alone – will not only transform the Old Oak Lane area it will also community and destroy the Old Oak Lane Conservation area / island triangle area's attractive setting of two-storey cottages and its appeal to residents and to the TV and film industry for location filming.</p>	<p>No change proposed.</p> <p>Policy P9 places a strong emphasises on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p> <p>While OPDC has not provided detailed policy guidance on building heights for parts of the Channel Gate site which are not located adjacent to sensitive locations, the site allocation capacity for a minimum 3,100 homes has been determined through a design led process. This process assumed average shoulder heights of between 6 to 12 storeys across the much of the site. The delivery of some tall buildings were assumed, at appropriate locations, ranging in heights from 20 to 30 storeys.</p> <p>While taller building heights may be deemed appropriate as more detailed proposals are developed for the site, these have not been assumed in determining the capacity for the site allocation.</p>	N	

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49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	9		Places		P9		<p>Third, Channel Gate area only has only one access point – Channel Gate Road – which connects with the A4000 Old Oak Lane, so high density development at Channel Gate Road so the delivery and service traffic needed for 3,100 new homes will make local traffic problems much worse. Even before the pandemic, TfL data showed central London van traffic had risen by 20% and most communities became dependent on deliveries to their home during the pandemic. We note that today (July 5) the Society of Motor Manufacturers & Traders (SMMT) has recorded that van sales for the first six months of 2021 have increased by 76% over 2020 which strongly suggests that UK and London businesses are making greater use of vans for daily operations, putting further strain on the capital's roads.</p> <p>This plan has not taken adequate consideration of such fundamental transport and social changes over the last 2-3 years and the impacts on existing and new communities when pursuing The Mayor's/its over-ambitious housing targets in Old Oak.</p>	<p>No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel.</p> <p>The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site.</p> <p>As set out in Policy T7, proposals will be required to reduce servicing and delivery trips and implement a delivery and servicing plan.</p>	N	
49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	10		General	Consultation			<p>5. Inadequate consultation This modified plan's central idea of using Channel Gate / Willesden Euroterminal Yard for high density high rise will dominate and degrade the existing low rise residential areas adjoining them. These massive changes have not been inadequately consulted on and should not be introduced via a mere 'modification' at this late stage of the plan approval process. Opportunities for face to face meetings and residents to examine traditional paper maps and models of proposed new developments has been lost – replaced by limited numbers of inadequate video calls. Since the OPDC has taken six years to assemble its draft Local Plan, it should allow the residents who are going to be most affected by its proposals a fresh opportunity to view, understand and comment on what will be massive changes to their community.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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49	Community / interest group	Mark	Walker	The Island Triangle Residents Association (TITRA)	11		General	Delay or withdraw the plan			Conclusion This modified local plan shows every sign of being rushed. Whether it is OPDC planners wanting to add an extra 3,100 homes into the Channel Gate Road next to our community at the eleventh hour of a six-year planning process and giving local people just a couple of Zoom calls to try to grasp the enormity of what is proposing ...or the simple fact that the Channel Gate housing target is recorded as 2750 in one chapter and then 3,100 elsewhere, we believe this plan is not adequately thought through. Its developments, calculations and consultation processes are not robust enough to ensure there are viable communities here in the future. A difference of 350 housing units across different documents may not mean much to some but it means everything to a community of 220 homes that has been here for 140 years. We ask that more time is given to rethink the current plan and restart this Local Plan's development process using more up to date information and more robust methods.	No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The proposed modifications to the Local Plan are underpinned by supporting studies. The Channel Gate Development Framework Principles document was produced to inform the proposals for Channel Gate. The principles set out in the Channel Gate Development Framework Principles document were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. 3,100 homes are identified for the Place of Channel Gate. 2,750 homes are identified for the Place of Old Oak Lane and Old Oak Common Lane.	N	
50	Local Resident	Jamie	Glazebrook		1		Places		P2		Feedback on the new consultation, with the vastly changed plans for Old Oak North. The gist seems to be that what a fully thought-through plan for a new town centre has been thrown out the window, and there is now going to be minimal spend in the Old Oak North area. While one must accept budgetary restraints, the new plan needs more thought.	No change proposed. The modified P2 policy (Old Oak North) is informed by the Old Oak North Intensification Study, Preliminary Infrastructure Design and Costing Study, Infrastructure Delivery Plan and Strategic Site Allocations Viability Assessment. Policy P2 will support investment in the area linked to industrial intensification and infrastructure provision, including new open space and improved walking and cycling routes. The supporting studies demonstrate that the policy is justified and effective.	N	
50	Local Resident	Jamie	Glazebrook		2		Places		P2		CANALSIDE – OLD OAK NORTH As the previous plan stated, a canal is a brilliant urban resource in terms of a place people will want to gather and socialise. The new plan should do everything it can to preserve some public canalside space, and make it easily accessible.	Noted. Policy P3 covers the Grand Union Canal place and it sets out a range of provisions to enhance the canal. Policy P2 works alongside this to ensure improved open space and access to and over the canal from Old Oak North.	N	
50	Local Resident	Jamie	Glazebrook		3		Strategic Policies		SP7		WILLESDEN JUNCTION TO OLD OAK COMMON STATON There is now no high street linking Harlesden through to the new Old Oak Common station. I heard talk about making the walkways better, but the plans seem very thin. There is, surely, a way to thread a public-facing street down from Willesden Junction station through to the canal, with industry on either side.	No change proposed. Given the change in approach in Old Oak North, there is no longer a transport or place-making need for an all modes route/high street running north to south through Old Oak North. Policy P2 (Old Oak North) supports improvements to walking and cycling routes, including the route from Willesden Junction Station into Old Oak North and routes to and over the canal. The policy also supports development that create positive and active frontages, including attractive and/or lively ground floor uses. along key routes.	N	
50	Local Resident	Jamie	Glazebrook		4		Town Centre and Community Uses		TCC4		CULTURE As per my email sent to you in the 2017 consultation, there needs to be a cultural destination in the new development. This is essential, because cultural destinations help give developments proper longevity. To be clear, I mean a theatre, concert hall, art gallery or large museum. Not a cinema. This site is going to be one of the best connected sites in the UK. To not properly capitalise on this is unthinkable.	No change proposed. Policy SP6 sets out how OPDC will seek to ensure that a new Cultural Quarter is delivered in the area that can complement nearby cultural clusters and contribute to London's wider cultural offer. Policy TCC4 seeks to protect existing and secure new cultural facilities.	N	

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50	Local Resident	Jamie	Glazebrook		5		Strategic Policies		SP4		<p>SCHOOLS, UNIVERSITIES</p> <p>My son is about to start at secondary school. I'm well aware what a 'black hole' this area is for schools. If you are serious about wanting people to move to Old Oak, there needs to be a plan to build a brilliant new secondary, and a couple of primary schools within the Old Oak development. If not, families will always move away when their kids reach secondary age, and a lasting community will never form.</p>	<p>No change proposed.</p> <p>The Local Plan is supported by a Social Infrastructure Needs Study (SINS), which identifies the social infrastructure necessary to support new development identified in the Plan. The study has identified the capacity that exists in existing social infrastructure to support early years of development, what new facilities are required on-site and when and where they should be delivered.</p> <p>The SINS identifies that one new 3FE primary school is required in 2031, while no need has been identified for a new secondary school within the plan period.</p> <p>The SINS findings are based on the most up to date modelling, but these requirements will be continually reviewed and updated by OPDC as development progresses.</p>	N	
50	Local Resident	Jamie	Glazebrook		6		Strategic Policies		SP6		<p>HARLESDEN TOWN CENTRE</p> <p>This is a chance to rejuvenate a beautiful town centre that has been criminally overlooked by Brent Council, as they pour all their money into developments in Wembley. There needs to be a proper plan so that the new Old Oak Development and the old Harlesden Town Centre both offer something different. Otherwise you'll have a situation like Shepherd's Bush, where Westfield is the destination and Shepherd's Bush Green is as neglected and depressing (in terms of the pound shops, kebab houses etc) as it was twenty years ago.</p> <p>Sorry to be brutal but this is really, really disappointing. Please will you rethink so that there is a plan that properly connects and revitalises this area.</p>	<p>No change proposed.</p> <p>The location of Old Oak major town centre now relates more strongly to existing links via Old Oak Lane, and will be supported by a series of new and enhanced connections, including proposals for improvements to Willesden Junction Station which will significantly improve pedestrian and cycle connectivity between Harlesden and the OPDC area.</p> <p>The proposed thresholds for measures to support Harlesden Town centre were not part of the Local Plan that was amended. Notwithstanding, these thresholds and measures are still considered effective and justified.</p>	N	

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51	Local Resident	Jane	Greenhalgh		1		Strategic Policies		SP9		<p>I am writing to express my concern - in fact objection - to the plans for high density residential development around the former Car Giant area, in particular for tower blocks around Scrubs Lane, Little Wormwood Scrubs and Mitre Way.</p> <p>I believe that the existing plans are out of date and new plans for residential towers are wrong for the area.</p>	<p>No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters and coordinating the location of tall buildings in clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p>	N	
51	Local Resident	Jane	Greenhalgh		2		Strategic Policies		SP7		<p>The transport infrastructure is already struggling with the increase in personal vehicles, Ubers, online deliveries etc and the pandemic means these are not going away in the short term.</p>	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	

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51	Local Resident	Jane	Greenhalgh		3		Strategic Policies		SP9		The pandemic has also caused shifts in the way people want to live - and gardens and open spaces have become more important. Little Wormwood Scrubs and Wormwood Scrubs have been even more important to me personally during the various lockdowns and they should not be overshadowed by towering developments.	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.</p> <p>No change proposed. OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p> <p>Policy 12 remains largely unamended and protects Wormwood Scrubs as Metropolitan Open Land. Policy SP9 requires development to respond to sensitive locations such as Wormwood Scrubs and Little Wormwood Scrubs.</p>	N	
51	Local Resident	Jane	Greenhalgh		4		Strategic Policies		SP9		North Kensington has experienced the appalling Grenfell tragedy and further high rises seem inappropriate.	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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51	Local Resident	Jane	Greenhalgh		5		General	Delay or withdraw the plan			I believe there is plenty of time to reconsider the original plans for the area due to the delays - and to find better solutions.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area. The proposed modifications are considered to be in general conformity with the 2021 London Plan.	N	
51	Local Resident	Jane	Greenhalgh		6		General	Support for community group comments			I support the views of the St Quintin and Woodlands Neighbourhood Forum on the various other elements of this planned development.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
52	Local Resident	Jason	Salkey		1		Places		P9		I object strenuously to the OPDC's Modified Local Plan for the following reasons: Any high rise and large buildings built on the eastern side of Channel Gate area / Willesden Euroterminal Yard) will dominate the low rise Old Oak Lane residential area (island triangle residential area) and undermine its attractive setting.	No change proposed. Policy P9 places a strong emphasis on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the area's heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.	N	
52	Local Resident	Jason	Salkey		2		Places		P9		In addition, the Channel Gate area only has only one access road which joins Old Oak Lane, so traffic on the A4000 will get worse. This is not careful strategic development - it is the OPDC making a tactical switch after failing to develop the Car Giant site; the amount of development proposed for Channel Gate is not sustainable.	No change proposed. No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel. Development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel. The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site. the Local Plan's transport chapter includes a series of planning policies which seek to promote the use of sustainable travel modes, minimise car parking levels and minimise the impacts of development on the highway network during construction.	N	

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52	Local Resident	Jason	Salkey		3		General	Extent of changes			2.The modified local plan's idea of using Channel Gate / Willesden Euroterminal Yard for high density high rise – which will dominate and degrade the existing low rise residential areas - has been inadequately consulted on and should not be introduced as a 'modification' at this late stage of the plan's development. Because face to face meetings were not possible in the pandemic and by offering limited online sessions, the OPDC has in effect kept such a radical change to its plan – moving housing from the Car Giant site to new sites by existing homes – hidden from local people.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
52	Local Resident	Jason	Salkey		4		Strategic Policies		SP9		3.The OPDC's assumptions through the draft plan that high rise housing is what many people want in the future is very questionable because the issue of making high rise buildings' exterior cladding safe still hasn't been resolved four years after the Grenfell disaster. Local people in Old Oak who have visited the redeveloped Stonebridge Park estate one mile to the North, can see that 4-5 storey developments have created more attractive and sustainable communities than is being proposed for Channel Gate Road and the expansion of North Acton.	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p>	N	

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52	Local Resident	Jason	Salkey		5		Strategic Policies		SP7		4. In its draft plan, OPDC claims that these new proposed housing locations will be "well connected" but the idea for the new Overground stations for Old Oak has been dropped, so these locations will not have adequate public transport and will add to the traffic problems and overcrowded Tube trains that this community was seeing, even before HS2 started its construction work.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	

53	Local Resident	Jennie Marshall	1	General	Consultation	<p>I am extremely concerned about the modified draft OPDC Local Plan and that the modifications have been made without consultation.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
53	Local Resident	Jennie	Marshall		2		Design		D5		If it goes ahead it is likely to make living and moving around the area virtually impossible.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	
53	Local Resident	Jennie	Marshall		3		Strategic Policies		SP7		As things are, traffic congestion at the junction of Scrubs Lane and North Pole Road and on to the A40 is significant and the tower blocks planned can only make this worse. Even if these residents are not supposed to own cars they will need public transport and the new station at Old Oak Common is not relevant to the Scrubs Lane/ North Pole Road/ A40 area since there is no vehicle access to the eastern end of the station.	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements. Old Oak Common station is accessible by foot, bike and bus and there is a new pedestrian/ cycle bridge linking the eastern entrance of the station to Scrubs Lane via the Grand Union Canal.	N	

53	Local Resident	Jennie Marshall	4	MM/PS2/OPDC/P10C5/1	Places	P10C5	<p>Why has there been no consultation about MM/PS2/OPDC/P10C5/1? Adding a high density development, destroying the views and vastly increasing pollution as cars and delivery vans queue, with no consultation is not acceptable. We, the local residents, need to be allowed proper consideration.</p>	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>Policies within the Local Plan seek to minimise car parking and ensure that impacts on the road network during construction are minimised.</p> <ul style="list-style-type: none"> • A dedicated phonenumber, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts</p>	N
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												<p>on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		

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53	Local Resident	Jennie	Marshall		5		Strategic Policies		SP4		So much has changed since the original plans were put forward. HS2 will not now be completed for 10 years, many more people will be working from home, why do we need these high rise blocks?	No change proposed. The Local Plan is required to be in general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel. The Secretary of State for Housing, Communities and Local Government's December 2020 ministerial statement on housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs which if anything, points to an increased need for housing since OPDC submitted its Local Plan. Notwithstanding this, Government requires that Local Plans are reviewed within 5 years of adoption and housing needs would be picked up within this review, at which point, the impacts of the Covid pandemic on housing needs will be clearer.	N	
53	Local Resident	Jennie	Marshall		6		Strategic Policies		SP8		The open space of Wormwood Scrubs and Little Wormwood Scrubs has been a life saver for many local residents through the pandemic -these blocks will destroy that small lung of green and space	No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. This would include Wormwood Scrubs and Little Wormwood Scrubs. Policy SP9 is not proposed to be modified.	N	

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53	Local Resident	Jennie	Marshall		7	MM/PS2/OPDC/P2/1	Strategic Policies		P2		<p>MM/PS2/OPDC/P2/1 is suggesting even more housing units in Scrubs Lane than the 2018 plan, even though there will be no new overground station at Hythe Road – why? Yet more traffic jams and pollution.</p>	<p>No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. These will enable people to reach a range of existing services and town centre uses in Harlesden, Kensal Green and White City.</p> <p>In addition to accessing existing services, the proposed modifications provide support for small scale walk-to town centre uses in clusters. The provision of town centre uses will provide services for both the community along Scrubs Lane and employees within Old Oak North.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The proposed modifications to Old Oak North are recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes.</p> <p>Scrubs Lane will be within a 15 minute walk of Old Oak Common Station and served by new and enhanced bus routes connecting the area to Harlesden, White City, Old Oak Common Station, North Acton and Park Royal. OPDC's Bus Strategy Update developed by TfL defines these bus routes.</p> <p>Proposed modifications to new and improved east-west walking and cycling routes are set out connecting Scrubs Lane to Old Oak North, Old Oak Common Station, Old Oak North, Old Oak Common Lane.</p> <p>These proposals show an improvement in PTAL levels and are shown in Figures 7.10 and Figure 7.11). The Local Plan requires car free development in areas of high transport accessibility as set out in Policy T4.</p> <p>Statements of Common Ground have been signed with landowners along Scrubs Lane demonstrating deliverability of development.</p>	N	

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53	Local Resident	Jennie	Marshall		8		Places		P12		<p>Surely we need a rethink. It is rare in Central London to have such a green space where the edges could be beautifully designed to accommodate a variety of needs, creating viable and happy mixed communities. This is a moment to reconsider what is really needed in this part of London and to support the efforts of the St Quentin and Woodlands Neighbourhood Forum..</p>	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	

54	Local Resident	Jenny Cogan	1	General Consultation	<p>I have just read the draft local plan for our area and am very very disappointed at the proposals and lack of consultation with people who have local knowledge.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
54	Local Resident	Jenny	Cogan		2		Strategic Policies		SP7		<p>My main points are:</p> <ul style="list-style-type: none"> Traffic and communications - the development as you describe MUST increase traffic in an area which is already very congested. Often there is a great build-up of traffic on Scrubs Lane, not to mention the junction with North Pole Road - where there is often a tailback right along St Quentin's Avenue. Cars and vans trying to come off the motorway to access Scrubs Lane may have a wait of 20 minutes at busy times. How could the area be a hub for business and commerce when it's already a bottleneck? 	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. In line with OPDC's sustainable transport hierarchy, movement by foot, bike and public transport has been prioritised across the OPDC area to reduce private car trips. In addition, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.	N	
54	Local Resident	Jenny	Cogan		3		Strategic Policies		SP7		<ul style="list-style-type: none"> Car-free accommodation is all very well if there are good buses and tubes at hand - but there is no obvious way of connecting Mitre Way with the tube, and buses already have a slow passage. Commercial vehicles to service the proposed housing will cause extra problems. Pollution being one of them. 	No change proposed. The Local Plan proposes two new pedestrian/ cycle bridges to connect Old Oak Common Lane and Mitre Yard – one that connects with the eastern entrance of Old Oak Common station via the Grand Union Canal, and the second that connects Old via Union Way and Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. These will link up Scrubs Lane with Old Oak Common station, Willesden Junction station and White City station. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of low emission vehicles. In addition, the Ultra Low Emission Zone is due to expand across the OPDC area in October 2021 requiring tighter emission standards from vehicles, which will contribute to an improvement in air quality in the short term.	N	
54	Local Resident	Jenny	Cogan		4		Design		D3		<ul style="list-style-type: none"> With so many aspects of working life having changed due to the epidemic this is surely a good moment for a rethink and a new, better plan based on local views and what is after all the government's objective of 'gentle density' and 'Building Better Building Beautiful' 	<p>No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF , reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid-19. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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54	Local Resident	Jenny	Cogan		5		General	Delay or withdraw the plan			<ul style="list-style-type: none"> What an opportunity for talented architects and planners to come up with something which would enhance and enrich the area rather than destroy it. A plan for future needs, not a series of compromises. 	<p>Noted. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>New and updated supporting studies have been developed to inform the proposed modifications as part of the plan led approach.</p>	N	
54	Local Resident	Jenny	Cogan		6		General	Delay or withdraw the plan			Let's start again!	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p>	N	
55	Local Resident	Jenny	Harbourne		1		General	Support for community group comments			I support the representations made by the StQW Forum	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.</p>	N	

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56	Local Resident	Jeremy	Aspinall		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
56	Local Resident	Jeremy	Aspinall		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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56	Local Resident	Jeremy	Aspinall		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
56	Local Resident	Jeremy	Aspinall		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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56	Local Resident	Jeremy	Aspinall		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
56	Local Resident	Jeremy	Aspinall		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
56	Local Resident	Jeremy	Aspinall		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
56	Local Resident	Jeremy	Aspinall		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High-density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	

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56	Local Resident	Jeremy	Aspinall		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High-rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
56	Local Resident	Jeremy	Aspinall		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to plan to be held back until we see the success of Oaklands and high-rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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56	Local Resident	Jeremy	Aspinall		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
56	Local Resident	Jeremy	Aspinall		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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56	Local Resident	Jeremy	Aspinall		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
56	Local Resident	Jeremy	Aspinall		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
57	Local Resident	Jo	Langton		1		General	Delay or withdraw the plan			<p>I am writing to express my concerns at the proposals to fix a design code for the large area North of Wormwood Scrubs common known as the OPDC, on the following grounds:-</p> <ol style="list-style-type: none"> Too much has changed in the way we live our lives, and will do in the future, due to the pandemic and now is not the time to fix your plans for future developments, before having any opportunity to fully understand or predict the post-pandemic housing and business needs of the area. 	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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57	Local Resident	Jo	Langton		2		Strategic Policies		SP8		2. Insufficient sports and recreation facilities have been provided and it is not acceptable to dump all this on the Wormwood Scrubs common, which is already challenged by increased footfall. Any development of the size proposed is legally obliged to provide enough of its own green spaces within it to serve the new in-coming communities, and the green spaces suggested in the plans are woefully insufficient in this respect.	No change proposed. Policy TCC5 provides policies to protect existing and deliver new high quality public and private sports and leisure facilities to meet local needs. Sport England have confirmed their support for the proposed modifications. Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces.	N	
57	Local Resident	Jo	Langton		3		Design		D3/D4		3. The mass drive for high rise buildings will reduce over the next ten years and your proposals will be very outdated by then. Evidence of vision for a future that combines sustainable technology, aesthetics and genuine care for providing low-rise, well-thought out new communities is sorely lacking in your plans that once again prioritise developers greed over people's need. Have a look at some of the new high-density, low-rise developments in Germany, Sweden and Norway... they are wonderful.	No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid-19. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	
57	Local Resident	Jo	Langton		4		General	Delay or withdraw the plan			Come on guys and girls, YOU CAN DO BETTER THAN THIS FOR THE WORLD. you can create something stunning and imaginative that is heralded around the world as a fabulous and sustainable development... an example to big cities everywhere. Something that provides real quality of life for everyone in all our diversities. Instead your proposals are driven by money, cheap materials, cheap cost-cutting design, an ugly imposition that compromises the quality of life of everyone who lives here.	No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. New and updated supporting studies have been developed to inform the proposed modifications as part of the plan led approach.	N	

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57	Local Resident	Jo	Langton		5		General	Delay or withdraw the plan			<p>Don't do it! Don't follow the cheap crappy option...You are all better than this. You have the resources, all you need is the brains and the creative vision to think OUTSIDE THE BOX, and stun the world with your excellence in town planning. Right now you are failing miserably but I am confident that, with a little more careful thought and time, you can turn this around! But you need people on board with genuine passion for improving lives and putting people before profit... or even putting people at the same level as profit would go a long way to helping you realise what a disaster your current plans are for the environment,</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>New and updated supporting studies have been developed to inform the proposed modifications as part of the plan led approach.</p>	N	
58	Local Resident	John	Cox		1		General	General			<p>(1) GRAPHICS IN 'TABLE OF FIGURE MODIFICATIONS'</p> <p>It may not be the most important issue during this consultation, but the point of having an old image and a new image side-by-side is to be able to compare them.</p> <p>On so many of the Policies Map breakdowns, this is made more difficult because of endless unnecessary small changes of colours, line thicknesses and shading when visually comparing them, of things that have not actually changed.</p> <p>For instance, why do 'SIL' and 'Mixed-use' areas change their colours? (and as an aside, why are some parts of the West Coast Main Line tracks labelled as SIL and others not?)</p> <p>I hope the Inspector shares the public's irritation.</p> <p>I want to be able to instantly see what has changed, and by shrinking line thicknesses and by changing/lightening areas, of things that have NOT changed - and presumably doing all that deliberately - this is impossible.</p> <p>Why cannot you also keep the keys of the graphics in the same place, and in the same typeface as the originals, as well?</p>	<p>Noted. No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>The figure formatting modifications have been carried out to support legibility. OPDC considers these help to improve the effectiveness of the Local Plan.</p>	N	
58	Local Resident	John	Cox		2		General	General			<p>(2) POLICIES MAP - KEY ROUTES</p> <p>Why have the Key Route lines got thinner?</p> <p>There are now no 'new' routes, only 'enhanced' routes shown on page 5 of that table mentioned above. But in other images of the Policies Map breakdowns, some routes have come back as dotted lines. Isn't that inconsistent?</p> <p>Are the dotted line ones only expected to apply after the end of the plan period?</p> <p>Why aren't other post-plan-period ones shown, like the one under the Dudding Hill Line? That would surely be considered a 'Key Route' by future Channel Gate residents, who would be unimpressed by yet another exit from their Channel Gate estate on to the same Old Oak Lane, which is what is shown.</p> <p>There are very good reasons to by-pass the Triangle estate for through traffic, so you should still promote that by-pass road around the Triangle estate, of course.</p>	<p>Noted. No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>The figure formatting modifications have been carried out to support legibility. OPDC considers these help to improve the effectiveness of the Local Plan.</p> <p>Proposed indicative designations have been removed from the Policies Map in response to the Inspector's Question 2. Discussions on this matter was carried out at Hearing Session 14. This has resulted in the proposed indicative desirable routes, including routes beyond the plan period, shown in Local Plan figures being removed from the Policies Map.</p>	N	

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58	Local Resident	John	Cox			3	Places		P8	4.27	<p>(3) WILLESDEN JUNCTION STATION</p> <p>Reference: Figure/PS2/OPDC/4.27 Policy: P8 Figure number: 4.27 Figure title: Old Oak Lane and Old Oak Common Lane</p> <p>I disagree that you can credibly identify a "Walking and cycling route" at Willesden Junction adjacent to the back gardens of houses in Tubbs Road in LB Brent.</p> <p>What about your Duty to Consult? Since this imposes a duty on you to co-operate with other local planning authorities where there is a strategic matter involved, are you saying (a) this isn't a strategic walking and cycling route, or (b) blame LB Brent (which I will, if necessary, you can be sure).</p> <p>Since Transport for London is also involved in this dreadful proposal, was it a case of group-think? ("Will no-one think about the residents?")</p> <p>The geometry of the location means having to safely pass over the 25-kV catenary of two freight railway tracks, and then run at high-level parallel to the tracks, along the bottom of all the gardens.</p> <p>Such a busy and noisy raised walkway is completely unacceptable, with the substantial loss of amenity daylight for the south-facing back gardens and the homes. You have told me that cross-sectional images of the proposal are "not available". That is a shame, because it would make the situation obvious.</p> <p>How ever did this flawed plan get put in your Local Plan? I hope the Inspector will interrogate you.</p> <p>It is unsound, in the planning system sense. It would blight the lives of residents in Tubbs Road for it to remain in your Local Plan.</p> <p>All you have said to me is that "the walkway would need to get planning permission", which is quite inadequate as a defence against this proposed scheme.</p> <p>Your walkway, if there is to be one, will need to take an alternative route, ideally the other side of the North London Line tracks.</p> <p>That alternative route was, of course, where it was going to go originally.</p>	<p>No change proposed. The proposals at Willesden Junction station have been developed in consultation with the London Borough of Brent. it should be noted that the design set out in supporting OPDC's Preliminary Infrastructure Design and Cost Study is preliminary and subject to further work and would eventually be subject to a planning application or Transport Works Act Order application. These detailed designs will need to accord with all relevant OPDC Local Plan, London and other material considerations to ensure any impact of the ramp on residents, particularly along Tubbs Road, is mitigated as the designs evolve. Visual and amenity impacts, daylight and sunlight impacts and noise impacts etc would be a material consideration as part of any proposal. We will ensure Brent and local residents are engaged as the proposals are progressed.</p>	N	

58	Local Resident	John	Cox		4		Delivery and Implementation		<p>(4) VIABILITY</p> <p>I hope the Inspector closely questions you regarding what infrastructure is 'required' to fully build out your plans for high-density Channel Gate, and what the status is of the two proposed roads</p> <ul style="list-style-type: none"> - underneath the Dudding Hill railway line, and - at the back of the Triangle estate. <p>(In the latter case, you ought to enquire of the opinions of Network Rail about their adjoining road bridge over the West Coast Main Line. I wouldn't say it's corroded, but the only plans of the bridge held by NR and supplied to me under an FoI request were produced by the London and North-Western Railway Ltd, from even before the railway groupings of 1923.</p> <p>The reason to mention this is that NR might want to replace their bridge at the same time as you wanted a new approach road constructed to it.</p> <p>It might also want to move the bridge abutments and piers, to allow space for future 12-car platforms on the West Coast Main Line after HS2 opens, and on the Milton Keynes - Croydon passenger route that currently has no viable station location at Old Oak Common.)</p> <p>My feeling about your Local Plan infrastructure financing generally is that what 'makes the cut' and what does not is somewhat imprecise (real life may be, but 'a plan is a plan') and you seem to put things in as funded, whether or not that relates closely to what infrastructure is required at various locations.</p> <p>Your Infrastructure Delivery Plan would benefit by having clearer views on what is</p> <ul style="list-style-type: none"> - critical (you waste that word by using it only for the HS2 station itself) - necessary - required, and - aspirational. <p>For instance, you have told me that you can achieve a complete build-out at Channel Gate in the plan period without the two extra roads mentioned above. Why would anyone fund them later then?</p> <p>Are you saying that you want to include only those road schemes which were necessary to enable housing development to proceed and to omit proposals which may still be justified on highways grounds but could not be funded with any certainty?</p> <p>Isn't there a DEger that future residents would disagree with you about what was 'necessary', imprisoned as they were by the cruel congestion of a single road, Old Oak Lane, however much there was a 21st Century requirement to 'reduce the need to travel'?</p> <p>A bus route underneath the Dudding Hill line would allow freedom, not to mention wider social engagement possibilities for residents.</p> <p>I hope the Inspector will be minded to ask you to explain in detail why unfunded proposals generally remain proposals shown in the plan.</p> <p>Are you saying that you can demonstrate deliverability on the grounds that</p> <ul style="list-style-type: none"> - those proposals may be currently unfunded, but - deliverability could be adequately demonstrated by a reasonable expectation of future funding based on a track record of submitting successful bids for funding? (It is a shame your track record is so bad at that, isn't it?) <p>You may be hamstrung in future bids for funding proposals not shown in the plan.</p> <p>But so many schemes remain as proposals for delivery beyond the plan period; in that case, should there be a policy indicating their safeguarding during the plan period, for delivery beyond the plan period?</p>	<p>No change proposed.</p> <p>The potential future link from Channel Gate to Old Oak Lane north of the railway cottages is presented only an aspiration. It's deliverability will be assessed through further proposals for the re-provision of Willesden Freight Terminal site and overall movement network for Channel Gate and the surrounding area.</p> <p>While projects may vary in terms of their importance, OPDC does not consider that sub categories are appropriate for projects considered necessary to support homes and jobs identified within the Local Plan period.</p> <p>Projects not identified as necessary to support homes and jobs identified within the Local Plan period are identified as desirable in the IDP.</p> <p>The IDP sets out the entire infrastructure requirements to support the Local Plan and outlines funding sources for necessary infrastructure. OPDC considers this supporting study to be evidenced, justified and therefore, sound.</p>	N
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											<p>Otherwise, you have to fall back on plan period requirements that may not be adequate:</p> <p>Paragraph 41 of NPPF (2012, which you are using, I believe) states "Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice".</p> <p>Paragraph 157 states "Local Plans should plan positively for the development and infrastructure required in the area...".</p> <p>In relation to using a proportionate evidence base paragraph 162 states that local planning authorities should assess the "ability of infrastructure to meet forecast demands".</p> <p>In paragraph 177 it is then stated that "It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion".</p>			
59	Local Resident	John	Evans		1		General	General			<p>Firstly I would like to draw your attention to this Ted talk on the maths of cities https://www.ted.com/talks/geoffrey_west_the_surprising_math_of_cities_and_corporations?utm_campaign=tedsread&utm_medium=referral&utm_source=tedcomshare which raises an interesting question about the inevitable trade-off between increasing profits from development and decreasing quality-of-life for the residents. Who are our cities for? How do we strike that balance?</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision. This will support the delivery of sustainable high quality development across the OPDC area and deliver benefits for Londoners and local people.</p> <p>New and updated supporting studies have been developed to inform the proposed modifications as part of the plan led approach.</p>	N	
59	Local Resident	John	Evans		2		Spatial Vision				<p>In general I support the regeneration of this area - to take advantage of the new affordances offered by the new physical transport communications coming through this area - HS2 & Crossrail.</p>	Noted.	N	
59	Local Resident	John	Evans		3		General	Support for community group comments			<p>I also support all of the comments you have received from the OON forum - especially regarding the need to balance the phasing of the new homes - with the infrastructure and connectivity to support those new homes. Viable, sustainable, self-contained, not temporarily overburdening surrounding local infrastructure - being key words/concepts that come to mind.</p>	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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59	Local Resident	John	Evans		4		Places		P7		a minimum of 6000 new homes - early delivery of 3,200 new homes (constrained and mandated by the London Plan and the OPDC's 1-10 year housing supply). This very-high-density very-high-rise housing development, on what is essentially a roundabout on a major arterial road / junction, seems to me to contravene many of your own design and 'place' policies.	No change proposed. OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The modified Local Plan policies P7 and P7C1 relating to North Acton continue to require high quality high density development in North Acton. Policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
59	Local Resident	John	Evans		5		Design			Principles for securing high quality design	Policies D1 b) ii ask developers to show different options have been considered, c) digital modelling and supporting data. Have you done modelling (can you demonstrate the data and models) of the impact this proposed high-density high-rise residential development may have on the 'quality of life' of existing local residents & and of the new residents (on the 50th floor of a tower block on a roundabout - in the new and highly unpredictable world of high speed transnational/pandemics - changing work patterns etc) - crime rates, physical health, mental health, essential services supply and demand, electoral impact in local government wards and parliamentary constituencies (remember Shirley Porter)	No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified. Policies SP2 and SP3 provide guidance to deliver Good Growth and support health and well being. These policies are subject to minor modifications. individual planning applications will be required to submit a Health Impact Assessment in accordance with OPDC's planning application validation checklist, which would need to set out potential impacts of a development on health and well-being considerations.	N	
59	Local Resident	John	Evans		6		Places		P7		Importing a 'minimum of 6000 new homes' into the North Acton Ward is definitely going to change the current political balance in that ward - for its existing residents. Also the new residents will be voting and paying local taxes in one borough - but the 'centre of gravity' of that 'place' for - most but not all services - will be in the neighbouring borough - so have you modelled how the politics and financing of that new service provision will work.	No change proposed. The Social Infrastructure Needs Study Update provides updates to health, education, community and emergency services provision. North Acton and Acton Wells has been identified as an area of search reflecting availability of development sites and it's accessibility by public transport and active travel networks. This has been agreed by the North West London Clinical Commissioning Group. Residents in different boroughs will be able to register and use facilities in neighbouring boroughs.	N	
59	Local Resident	John	Evans		7		Places		P7		Its not clear to me what types of ownership/renting you are imagining for these 6000 new residents. Having worked in public sector housing for many years - its not clear to me that we have as yet worked out a; good, viable, high-quality-of-life, methods/policies for managing such dense and diverse occupations.	No change proposed. As set out in Policy H2, OPDC has adopted a strategic 50% affordable housing target subject to the viability threshold set out in the 2021 London Plan. At least 30% of affordable housing is required to be social rent or London Affordable Rent. The remainder is required to be a mix of social rent/London Affordable Rent, London Living Rent or Shared Ownership.	n	
59	Local Resident	John	Evans		8		Design		D4		I shudder at the sight of 55 stories of balconies being built directly above a major road. Have you got a foolproof way of stopping people throwing their broken microwave off their balcony.	No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	

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59	Local Resident	John	Evans		9		Housing				If you are planning owner occupation - is that idea still viable post-Covid / Grenfell	<p>No change proposed.</p> <p>The Local Plan is required to be in general conformity with the Mayor of London's 2021 London Plan in respect of OPDC's housing targets. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>The Secretary of State for Housing, Communities and Local Government's December 2020 ministerial statement on housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs which if anything, points to an increased need for housing since OPDC submitted its Local Plan. Notwithstanding this, Government requires that Local Plans are reviewed within 5 years of adoption and housing needs would be picked up within this review, at which point, the impacts of the Covid pandemic on housing needs will be clearer.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	n	

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59	Local Resident	John	Evans		10		General	Delay or withdraw the plan			<p>It seems that the requirement for this level of housing is driven by the London Plan - but what if the London Plan is in urgent need of a complete rethink - to take account of massive changes to life-work transport patterns brought about by Covid - Grenfell - Zoom - internet shopping - internet everything - the urgent need for a new/coherent building regs system - none of which were imagined when the London Plan was being drawn up and agreed - set in concrete.</p>	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Additionally, in March 2020, prior to the adoption of the London Plan, the Secretary of State for Housing, Communities and Local Government (MHCLG) wrote to the Mayor of London asking him to make modifications to the London Plan. The Secretary of State HCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land. More recently, the Secretary of State for MHCLG's Ministerial Statement (16 December 2020) regarding housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs. These Government statements point to an increased need for housing since OPDC submitted its Local Plan. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	

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59	Local Resident	John	Evans		11		General	Delay or withdraw the plan			What if the London Plan needed to be reviewed in the light of new National/Regional Policies - new ideas about levelling up the regions. Should this particular (university based) development be happening in London just because the marginal cost/benefit is lower/higher for the developers here - or should it be being directed to smaller less affluent cities that actually want and need new university places jobs students and housing. Personally I think it should.	<p>No change proposed. OPDC considers the proposed modifications to be in general conformity with the 2021 London Plan. The Mayor has confirmed the modifications are in general conformity.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Additionally, in March 2020, prior to the adoption of the 2021 London Plan, the Secretary of State for Housing, Communities and Local Government (MHCLG) wrote to the Mayor of London asking him to make modifications to the London Plan. The Secretary of State HCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land. More recently, the Secretary of State for MHCLG's Ministerial Statement (16 December 2020) regarding housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs. These Government statements point to an increased need for housing since OPDC submitted its Local Plan. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>The Local Plan provides guidance for supporting and managing catalyst uses which could include education facilities such as universities.</p>	N	
59	Local Resident	John	Evans		12		Places		P7		I would support a plan for maybe 10 or 15 stories of new-industry high-tech incubator-startup type jobs on this roundabout - daytime jobs - travel in to work and then go home at night type jobs - jobs that needed the special physical connectivity that will oneday be available in this area, but super-dense high-rise residential accommodation on a roundabout is surely asking for trouble.	<p>No change proposed.</p> <p>OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The modified Local Plan policies P7 and P7C1 relating to North Acton continue to require high quality high density development in North Acton.</p> <p>Policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
60	Local Resident	Julie	Jones		1		General	Support for community group comments			I would like to add my support to the letter sent by Sir Stephen Waley Cohen on behalf of Friends of Wormwood Scrubs. I support the Friends of the Scrubs objections for the following reasons.	Noted. Please refer to OPDC's responses to the Friends' of Wormwood Scrubs comments.	N	

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60	Local Resident	Julie	Jones		2		Strategic Policies		SP8		<p>1. The proposed plan does not have the interests of local residents at heart. No provision has been made for green spaces, public amenity areas and a general feeling of light and space that people need to enjoy a reasonable quality of life. The main objective appears to be maximum profit over sustainability, harmony and basic good design.</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and facilitate the development of the area. This will support the delivery of sustainable high quality development across the OPDC area and deliver benefits for Londoners and local people.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy D5 provides specific guidance for delivering appropriate levels of amenity for building users.</p>	N	

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60	Local Resident	Julie	Jones		3		Places		P10		<p>2. The proposed development at the end of Mitre Way features buildings of overwhelming density, completely inappropriate for the area and bearing no respect whatsoever for local residents. Besides this, it seems that no one has considered how this development will affect the traffic on North Pole Road. The junction where it joins Wood Lane and Scrubs Lane is already extremely congested as well as dangerous, with vehicles accelerating up the wrong side of the road to turn right at the lights. This ill thought out plan would leave traffic at a standstill.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. TfL own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>Policies within the Local Plan seek to minimise car parking and ensure that impacts on the road network during construction are minimised.</p> <p>The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.</p>	N	

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60	Local Resident	Julie	Jones		4		Strategic Policies		SP8		<p>3. There is little or no consideration for providing green spaces for recreation and well being. The importance of this is now widely acknowledged and proven to improve mental and well as physical health, and yet the plan merely makes lazy references to providing 'access to nature,' and 'integrating green spaces.' This means little or nothing. What's more, Wormwood Scrubs itself must not be commandeered for this purpose. The Scrubs has already suffered during the last year due to extra footfall, and the toll on the wildlife has been great. This has been further exacerbated by HS2, which has caused significant destruction. It should be protected, not exploited by OPDC and used to tick a 'green spaces' box. Genuine new green spaces should be created.</p>	<p>No change proposed.</p> <p>In addition to the protection and enhancement of existing green space, the Local Plan requires new development to contribute towards 30% of the developable land outside of SIL to be delivered as publicly accessible open space. This includes the creation of two new Local Parks of a minimum 2 ha in size located at Channel Gate and Old Oak South.</p>	N	
60	Local Resident	Julie	Jones		5		Strategic Policies		SP9		<p>4. There appears to be no harmony at all in the mass of tall buildings proposed. The area has already lost huge amounts of sky views from recent developments such as the jarring Imperial College development. The last thing that's needed is more tall buildings of random design blighting our skyline. These buildings will still be there long after we are all dead and gone and OPDC need to take the design seriously rather than focus on maximum scale and profit. It is surely time to go back to the drawing board and design something that Londoners can be proud of, that shows urban design at its best and has the needs of the community at its heart. Having lived in the area for over twenty years I dread seeing more damage done by greedy property developers with ill thought out designs such as this one.</p> <p>I reject this modified draft plan for all the reasons above.</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The locations considered suitable for tall buildings in the modified Local Plan is considered to be justified and is evidenced through a range of new and updated supporting studies, principally the Tall Buildings Statement, Channel Gate Development Framework Principles and Scrubs Lane Development Framework Update.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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61	Local Resident	Kim	Evans		1		Places		P10C5		<p>My name is Kim Evans. My email address is XXX I live in W10, close to Scrubs Lane and I am a regular user of Wormwood Scrubs and Little Wormwood Scrubs Park. My understanding is that the consultation process does not require me to provide my full address. I am writing to object to the latest modifications in your Local Plan for this area. In particular, I oppose the fifth 'cluster' along Scrubs Lane at North Pole Depot East (to the immediate north of Little Wormwood Scrubs), which is not a last-minute modification but a significant new development.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

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61	Local Resident	Kim	Evans		2		Places		P10C5		<p>The changes to the previous Draft Local Plan are significant. The consultation letter sent to households in May 2021 was inadequate and misleading. This said 'much of our draft Local plan hasn't changed'. But there are big changes affecting where we live. The proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan and cannot be treated as a minor modification.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

61	Local Resident	Kim Evans	3	MMPS2/OPDC/P10C5/1	Places	P10C5	<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. More residential towers are also planned for Scrubs Lane. How were we meant to hear about these latest plans?</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. The phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. These reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. 	N
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												<ul style="list-style-type: none"> • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 		
61	Local Resident	Kim	Evans		4		Strategic Policies				<p>The plans will destroy the views from our local open spaces. The open skylines of Wormwood Scrubs and Little Wormwood Scrubs are part of the common land that is hugely valued and used by the local community, many of whom live in large housing estates in one of the most densely populated and deprived areas of the country.</p>	<p>No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The assessment of the impacts of tall buildings undertaken as part of the Scrubs Lane Development Framework update has found that there is no increased impact on Wormwood Scrubs as a result of the proposed modifications.</p>	N	

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61	Local Resident	Kim	Evans		5		Places		P10		<p>The lack of transport - or plans to increase transport and road systems in the area - is a significant issue. A new station at Old Oak Common will do little to improve our public transport options. With no vehicle access from Scrubs Lane to the eastern end of the station, how can people get there? Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane sees longer queues every year. Why is a new Local Plan not dealing with this issue?</p>	<p>No change proposed.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can then continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects with the eastern entrance of Old Oak Common station via the Grand Union Canal, and the second that connects Old via Union Way and Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area in including providing bus access to Old Oak Common station. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	

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61	Local Resident	Kim	Evans		6	MM/PS2/OPDC/P2/1	Places		P10		<p>With no new Overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	

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61	Local Resident	Kim	Evans		7		Places		P10		<p>None of the four tower blocks already approved by OPDC along Scrubs Lane since 2017 has been built. This is the wrong location for high density living. What evidence do you have that people will want to live here rather than at the new developments at White City? Extra buses will do little to improve access to public transport. What makes you think new shops and cafes want to start up in a street which goes through an industrial area?</p>	<p>No change proposed.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>3 tall buildings have been approved by OPDC since its inception on Scrubs Lane. One of these is now under construction with one shortly to be under construction.</p>	N	

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61	Local Resident	Kim	Evans		8		General	Delay or withdraw the plan			<p>This whole plan feels rushed and does not reflect the changes in society in recent years: Grenfell, Covid, many families and business choosing to leave London. As Old Oak Common Station will not be open for 8-12 years yet, we urge you to step back and consult on a new plan that will be fit for the future and not a reflection of life in a very different era that is unlikely to attract new communities and will severely change the life of those already living here.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

62	Local Resident	Krystyna Wilowska	1	General	Consultation	<p>Your website makes a response from a member of the public very difficult as it requires detailed knowledge of the OPCD modifications and there is no opportunity to make my huge anxieties known. I feel I have never had the chance to object</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phonenumber, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
62	Local Resident	Krystyna	Wilowska		2		Places		P7		<p>I feel I have never had the chance to object to any of the inappropriately large towers and high-rise homes springing up next to my low-rise residential estate: Acton Garden Village in West Acton. The towers being constructed are ugly and menacing. Apparently, more are going to be built: there are proposals for an extraordinary number of new homes nearly 55 story buildings in the middle of Gypsy Corner roundabout above North Acton station.</p> <p>Please reconsider removing or considerably reducing the towers close to the low-rise housing that already exists in this part of London. I really do not want to feel forced to leave a city I have loved and one I want to continue living in.</p>	<p>No change proposed.</p> <p>OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The modified Local Plan policies P7 and P7C1 relating to North Acton continue to require high quality high density development in North Acton.</p> <p>Policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
62	Local Resident	Krystyna	Wilowska		3		Places		P7		This area is already a well-known pollution hot spot. The proposal for many densely packed residential apartments in such a place will inevitably add to the pollution	No change proposed. Please refer to air quality policy EU4 which ensures that air quality is addressed as part of all planning applications in the area.	N	
62	Local Resident	Krystyna	Wilowska		4		Places		P7		This area is already a well-known pollution hot spot. The proposal for many densely packed residential apartments in such a place will inevitably add to crime	No change proposed. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. Policies SP9, D1 and D3 require proposals to be appropriately designed to minimise crime.	N	
62	Local Resident	Krystyna	Wilowska		5		Places		P7		This area is already a well-known pollution hot spot. The proposal for many densely packed residential apartments in such a place will inevitably add to the congestion, pollution	No change proposed. The Local Plan sets a range of policies to support a mode shift away from private vehicles to reduce congestion and pollution, from new and enhanced stations, to measures to support walking and cycling, to requiring EV charge points and a bus strategy. All these measures will reduce transport pressure and improve air quality. Policy EU4 of the Local Plan also contains a series of measures to secure an overall improvement in air quality. In addition, the Ultra Low Emission Zone is due to expand across the OPDC area in October 2021 requiring tighter emission standards from vehicles, which will contribute to an improvement in air quality in the short term.	N	
62	Local Resident	Krystyna	Wilowska		6		Places		P7		The total lack of planning amenities and open spaces into the project is irresponsible	<p>No change proposed.</p> <p>The Local Plan requires proposals to ensure that 30% of developable land outside of SIL is delivered as publicly accessible open space. This includes the delivery of two new Local Parks, of a minimum 2 ha in size, and a series small public open spaces serving a variety of functions.</p>	N	

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62	Local Resident	Krystyna	Wilowska		7		Strategic policies		SP9		<p>I believe the OPCD is embarking on a highly dangerous social experiment which will blight the lives of its existing residents, not to mention the new ones who will be forced to live in social housing that is polluted and noisy. Post Grenfell, post Covid19 and now post Miami: is it not a horrendous proposal to build such huge towers to house people and impact onto quiet residential homes nearby?</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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62	Local Resident	Krystyna	Wilowska		8		Strategic Policies		SP9		I support developments that give housing to the homeless, and I support rejuvenating derelict parts of our capital city. I was born, bred and educated in London and have lived in this city all my life. However, I am now beginning to feel I want to escape London because of the march towards turning our beautiful capital into a high-rise wasteland. There seems to be a concerted and deliberate effort to prevent people from objecting to this movement and these developments. We rarely get adequate notification about new projects and making our objections known seems to be intentionally difficult. Our Residents' Associations objections are ignored by the planning departments of our Councils and have been for many years now. The nomenclature associated with each development seems to be very misleading so that residents do not realise how tall the towers will be and where they will be built. My neighbours on our estate are all feeling very unhappy about the towers and, like me, think that there may be no point in expressing objections since we are not supported by our local Council. Surely existing residents have a right to less pollution, congestion and crime, not having to face more of it in the future. I managed to join a webinar consultation session about "One Portal Way" – a code for one development on Gypsy Corner roundabout. Invited to ask for a "chat" afterwards by the Agency, I wrote the attached note in response to that invitation. No one has yet got back to me and I must say that the whole experience was disappointing because the Agency is clearly paid to ensure that the so called "consultation" should endorse the tower proposals. I felt I was being used and channelled to reply appropriately to "tick the boxes" of approval. I hope you might read my attached response. I fully agree with the chair of WARA (West Acton Residents' Association) who has also written to you on our behalf.	No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
63	Local Resident	Linda	Hartley		1		General	Delay or withdraw the plan			The island triangle residents' association believes that the March 2021 version of the Draft Plan is not sound and it will not lead to a successful and sustainable new Old Oak. We think there are important reasons for developing a new Local Plan. First, local people know that the HS2 Old Oak Common station will not be open for a decade and second, since the OPDC is trying to get current draft plan approved during the pandemic, there have been huge changes in London's population, workforces and people are still seeking new ways of working and living. As a result, the current plan's assumptions for development are outdated.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect on the impacts of Brexit and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	

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63	Local Resident	Linda	Hartley		2		General	Extent of changes			While the OPDC has claimed in its consultation that 'most of the Plan remains the same' as its 2018 draft plan, the changes proposed are substantial with entirely new locations - such as Channel Gate / Willesden Euroterminal Yard post HS2 operations, Atlas Road and Acton Wells' on Victoria Road - have been chosen as sites for very high density and high rise housing. Making these changes through late modifications is not sound planning process.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
63	Local Resident	Linda	Hartley		3	MM/PS2/OPDC/P9/1	Places		P9		This modified plan's central idea of using Channel Gate / Willesden Euroterminal Yard for high density high rise – which will dominate and degrade the existing low rise residential areas - has been inadequately consulted on and should not be introduced via a 'modification' at this late stage. By exploiting the lack of face to face meetings during the pandemic and limited online consultation sessions carried out with local people, the OPDC has kept such a radical change – housing moving from the Car Giant site to new areas whose development will be harmful to existing residential homes - hidden from local people.	<p>No change proposed.</p> <p>Policy P9 places a strong emphasis on the importance of the Old Oak Lane conservation area and Grand Union Canal Conservation Area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement.</p>	N	
63	Local Resident	Linda	Hartley		4	MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1	Strategic Policies		SP7		Through the draft plan, the OPDC uses the mantra that these new housing locations will be "well connected" but since the idea of Overground stations for Old Oak has been abandoned, these locations will not have adequate public transport. The A4000 Old Oak Lane Victoria Road is already badly affected by traffic from HS2's works and will be for a decade, so even putting on additional bus services in the meantime before HS2 is completed will not resolve these problems.	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	

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63	Local Resident	Linda	Hartley		5		Strategic Policies		SP9		<p>Since the issue of making high rise building cladding safe has not been resolved four years after the Grenfell disaster, we question the OPDC's assumptions (throughout the draft plan) that high rise housing is what many people want or need in the future – locals who have visited the redeveloped Stonebridge Park estate only one mile to the North, can see that 4-5 storey developments create more attractive and sustainable communities than is being envisioned for Channel Gate Road and the expansion of North Acton.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p>	N	
63	Local Resident	Linda	Hartley		6		Places		P9		<p>The OPDC's 2021 Draft Local Plan version talks about the Channel Gate enclave being part or the site for 'major town centre uses' – which is a misguided idea, for two three main reasons: First, the Channel Gate area (centred on the Willesden Euroterminal Yard) is closely adjoined by the existing Old Oak Lane residential area (otherwise known as the island triangle residential area). Putting high density and high rise building on the Channel Gate site will greatly harm the existing housing's attractive setting and appeal.</p>	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>Policy P9 places a strong emphasis on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the area's heritage.</p> <p>Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p>	N	

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63	Local Resident	Linda	Hartley		7		Places		P9		Second, Channel Gate area only has only one access road - Channel Gate Road – which connects with the A4000 Old Oak Lane, so high density development at Channel Gate Road will make local traffic problems much worse.	<p>No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel.</p> <p>The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site.</p> <p>The Local Plan's transport chapter includes a series of planning policies which seek to promote the use of sustainable travel modes, minimise car parking levels and minimise the impacts of development on the highway network during construction.</p>	N	
63	Local Resident	Linda	Hartley		8		Places		P7		Third, residents note that the existing North Acton area surrounded by the Gypsy Corner gyratory is nothing more than a series of high rise student accommodation with some fast food outlets allowed at ground level for students and people travelling through the area; it is not credible to say it is a functioning town centre as the OPDC claims in this draft plan.	<p>No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
63	Local Resident	Linda	Hartley		9	MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a.	Strategic Policies		SP6		We believe that cramming high rise onto Channel Gate and seeking to portray it and the student tower blocks more than half a mile away at North Acton, as some kind of 'town centre', is not a credible development concept or strategy; it is simply a case of the OPDC having to overload the area with housing because it failed to deliver the 6,500 homes planned for the Car Giant site.	<p>No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p>	N	

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64	Local Authority	Ciara	Whelehan	London Borough of Brent	1		Strategic Policies		SP6 and SP7		<p>The retention of Old Oak North as Strategic Industrial Location (SIL) is a change that will have fundamental impacts on the design and layout of the Opportunity Area as a place and the benefits that will accrue from the delivery of the HS2 station. The original plan's places along a strong central spine proposed between Wormwood Scrubs and Willesden Junction in particular had a logic to it and the ability to create a seamless high quality environment between the two which would have been beneficial for Harlesden and Brent. Undoubtedly this change does remove some opportunities for improved connectivity to the wider area.</p> <p>Although the Council is disappointed and feels the Regulation 19 Plan presented a better opportunity for placemaking, it understand the modification is a reflection of the Inspector's Interim Findings. However, it does not mean the Plan should water down its ambitions for the creation of a high quality place. In particular, we are strongly of the view the Plan should continue to require high quality connections to Harlesden via Willesden Junction Station. Transport impacts as a result of continued/increased movements of HGVs and impacts on Harlesden Town Centre remain key issues for Brent. Please see detailed comments under the 'Transport Modelling' section. In relation to the town centre, a more inward looking development of the OPDC area could also limit the extent to which additional patronage from new residents and visitors to the area will be diverted to Harlesden, placing further onus on the need for financial contributions to mitigate impacts on Harlesden Town Centre.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. The Local Plan and IDP set out a range of new and enhanced connections which will ensure that Old Oak, Willesden Junction and Harlesden are well connected.</p> <p>The location of the town centre now relates more strongly to existing links via Old Oak Lane, and will be supported by a series of new and enhanced connections, including proposals for improvements to Willesden Junction Station which will significantly improve pedestrian and cycle connectivity between Harlesden and the OPDC area.</p> <p>Although relocated from Policy TCC3 to Policy TCC1, the proposed thresholds for measures to support Harlesden Town centre were not part of the Local Plan that was amended.</p>	N	
64	Local Authority	Ciara	Whelehan	London Borough of Brent	2		Places		P11		<p>Whilst the station will not serve a new residential community in Old Oak North, it will serve new and existing residents and businesses. The Plan refers to the station in justifying the sustainability of the Channel Gate site for additional residential development. The retention of Old Oak North SIL does remove some opportunities for improved connectivity to the wider area, but the need for a high quality station which is well connected to the surrounding area remains. Old Oak Street no longer connects Old Oak North to Willesden Junction Station and on to Scrubs Lane. This has been replaced with a proposed walking route to Harrow Road north of the railway lines, and enhanced walking and cycling bridge to Old Oak North. Modifications to wording now states routes could be 'new and/or enhanced.' (Ref: MM/PS2/OPDC/P11/1).</p> <p>Whilst a small change addition of 'or' indicates there could be no new routes. Given that there is a need for a new routes to the east to Scrubs Lane this modification is not justified and therefore unsound.</p>	<p>No change proposed. The proposed modification is justified and reflects evidence set out in the Preliminary Design and Cost Study that some elements of the proposed connections to Willesden Junction station will be new and some will be enhancements to existing routes - such as to the west of Willesden Junction station and beyond the new footbridge to the south into Old Oak North.</p>	N	
64	Local Authority	Ciara	Whelehan	London Borough of Brent	3		Willesden Junction Feasibility Study				<p>We welcome the proposals outlined in the recent Willesden Junction station feasibility study which will bring about much needed improvements to the station. A priority for the Council remains the need to improve linkages from the station to Harlesden Town Centre as part of these proposals.</p>	<p>Noted. OPDC will continue to work with the London Borough of Brent, TfL and Network Rail as proposals for Willesden Junction station develop, including linkages to Harlesden Town Centre.</p>	N	

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64	Local Authority	Ciara	Whelehan	London Borough of Brent	4	MM/PS2/OPDC/SP/38	Strategic Policies		Table 3.1		The Plan allocates 1 Lakeside Drive in Brent for 300 homes and a minimum of 500sqm commercial or industrial floorspace (Ref: MM/PS2/OPDC/SP/38). The site is within an area outside Park Royal SIL, which has come forward for high-density residential and commercial development and supporting community facilities in a landscaped setting. The addition of further residents will have benefits in helping to provide a critical mass to help make supporting services and social infrastructure remain viable. In this context, the allocation is supported.	Noted.	N	
64	Local Authority	Ciara	Whelehan	London Borough of Brent	5	MM/PS/OPDC/M9(1)	Housing		H2		At Regulation 19 Stage Brent Council objected to policy H2 on the grounds it did not place sufficient weight or clarity on how evidenced affordable needs will be prioritised compared to products classified as affordable housing, but which do not necessarily meet affordable needs. Modifications to H2 now require a minimum 30% London Affordable Rent (LAR) and the remainder as a range of social rent, LAR or Intermediate housing (Ref: MM/PS/OPDC/M9(1)). This policy is subject to the Mayor's threshold approach as set out in 2021 London Plan policy H5. Meaning if a developer provides 35% affordable housing with 30% LAR they have met the policy criteria and do not need to provide viability evidence. It is therefore effectively at the developer's discretion if they wish to exceed the 30% threshold or provide social rent. The Council remains concerned that the desire to show attainment of a higher affordable housing target will be at the expense of addressing the majority of those identified to be in affordable need. The Council maintains a higher proportion of social rent/LAR should be sought, reflective of the objectively assessed need in the housing market area. 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.	No change proposed. The challenges around viability, 50% affordable housing target and meeting objectively assessed housing need were discussed at length at the Examination Hearing Session 9 in April 2019. The Inspector has not directed OPDC to make any further modifications in his Interim Findings.	N	
64	Local Authority	Ciara	Whelehan	London Borough of Brent	6		Town Centre and Community Uses		TCC1		Old Oak Major Centre now include Atlas Junction local centre and terminate around Channel Gate. It will not connect to Harlesden Town Centre. The OPDC Retail & Leisure Needs study emphasises the importance of improving connections between Old Oak and Harlesden stating '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.' The Retail & Leisure Needs Study has not been updated in light of the modifications, and as such the impact of the new alignment on Harlesden Town Centre has not been assessed	No change proposed. The overall quantum of homes and jobs during the Local Plan period has remained largely as it was in the Submission Local Plan - albeit slightly lower. The need and rationale for a major town centre is still justified as the previous modelling showed that the combination of retail, food and beverage and office uses would in floorspace terms, put the Old Oak Major Town Centre comfortably within the London Plan definition for a major town centre. The impact of this town centre on the hierarchy of surrounding centres is considered to be less significant than it was in the Submission Local Plan. This is in part because the homes and jobs capacity has come down slightly, meaning that a lower proportion of town centre use floorspace is now being proposed, and in part because the geographic location of Old Oak Major Town Centre is now further from Harlesden Town Centre, which was the centre most likely to be impacted by the planned Old Oak Major Town Centre. Old Oak Major Town Centre now being located further away from Harlesden Town Centre will diminish the direct competition with this centre. Through proposals to enhance connections between Harlesden Town Centre and development in the OPDC area, outlined in the Local Plan and IDP, Harlesden will have a similar ability to capitalise on opportunities created by new development at Old Oak. It should be noted that Policy TCC1 still requires proposals, where appropriate, to contribute towards measures that support the continuing vitality of Harlesden Town Centre.	N	

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64	Local Authority	Ciara	Whelehan	London Borough of Brent	7		Town Centre and Community Uses		TCC1		It is welcome, the Plan requires development for main town centre uses above a certain threshold to contribute to measures to support the vitality and viability of Harlesden Town Centre, through physical links or financial contributions. Given that the location of the centre removes the opportunity to create physical links, this places further onus on the need for financial contributions to mitigate impacts. The Council 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, for the reasons previously set out. It is considered as a maximum the threshold should be 2,500sqm, reflective of the default standard in the NPPF.	No change proposed. The relocation of the Town Centre does not remove the opportunity to create physical links with Harlesden. On the contrary, the location of the town centre now relates more strongly to existing links via Old Oak Lane, and will be supported by a series of new and enhanced connections, including proposals for improvements to Willesden Junction Station which will significantly improve pedestrian and cycle connectivity between Harlesden and the OPDC area. The proposed thresholds for measures to support Harlesden Town centre were not part of the Local Plan that was amended. Notwithstanding, these thresholds and measures are still considered effective and justified.	N	
64	Local Authority	Ciara	Whelehan	London Borough of Brent	8		Town Centre and Community Uses		TCC1	10.9	A minor point of referencing, point h cross-references thresholds in paragraph 10.9. We note the thresholds are now in paragraph 10.11.	Change proposed. It is proposed to amend the text so that the correct paragraph number will be referenced in Policy TCC1 g).	Y	40/33
64	Local Authority	Ciara	Whelehan	London Borough of Brent	9		Town Centre and Community Uses		TCC4		The Plan now states there is no need for a 6FE secondary school and only a 3 FE primary school rather than a 4 FE, (Ref: MM/PS2/OPDC/TCC4/3) reflecting the latest GLA school roll projections. Similarly, the Council is seeing reduced demand. Whilst this reflects current projections, we would highlight the significant uncertainty around the projections at present as the impacts of COVID in the short, medium and long-term remain unclear. The Plan needs to be responsive to change and the OPDC need to continue to engage with the boroughs on this matter. It is considered policy TCC3 provides sufficient flexibility by cross referencing the Infrastructure Delivery Plan, which is to be kept under review.	Noted.	N	
64	Local Authority	Ciara	Whelehan	London Borough of Brent	10	MM/PS2/OPDC/T1/1	Transport		T1	7.8	Para 7.8 states that 'Outside of designated Strategic Industrial Location (SIL) areas, measures to prioritise bus movement, provide segregated facilities for cyclists and create pedestrianised areas will be supported' (Ref: MM/PS2/OPDC/T1/1). It is the Council's view that such measures should be prioritised across the whole OPDC area, not just outside designated SIL areas, to ensure that issues around congestion, poor air quality, climate change, accessibility, etc. can be properly addressed and to help meet the overarching Mayoral sustainable mode share target. In particular, given the likely high volume of freight movements in SIL areas, safe, segregated facilities for cyclists and pedestrians may be particularly desirable.	Change proposed. Text has been updated to refer to the whole OPDC area for supporting measures to prioritise bus movement, provide segregated facilities for cyclists and create pedestrianised areas.	Y	64/10

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64	Local Authority	Ciara	Whelehan	London Borough of Brent	11	MM/PS2/OPDC/P4/6; MM/PS2/OPDC/P6/13	Places		P4, P6	4.61, 4.97	Further emphasis should be given to promoting walking and the needs of pedestrians throughout the plan area. In particular, Policy P4 (Park Royal West) and Policy P6 (Park Royal Central would benefit considerably if the final bullet points in the supporting text at paras 4.61 and 4.97 were re-worded to say: 'creating and upgrading pedestrian and cycling facilities to deliver a joined up, accessible walking and cycling network' (Ref: MM/PS2/OPDC/P4/6; MM/PS2/OPDC/P6/13).	Change proposed. It is proposed that text is updated to not the need for new and upgraded walking as well as cycling facilities.	Y	64/11
64	Local Authority	Ciara	Whelehan	London Borough of Brent	12	MM/PS2/OPDC/T1/1	Transport		T1		In terms of the road network the Plan states 'There are two existing vehicular routes serving Old Oak North: Hythe Road/Salter Street and Haul Road. These offer reasonable vehicular access into the area and may be sufficient to support increased business traffic associated with the proposed level of industrial intensification. However, more detailed transport assessments will be required as part of future planning applications in order to test and understand the impacts of development proposals.' (Ref: MM/PS2/OPDC/T1/1). The removal of EMR and Cargiant SIL was positive for Harlesden in likely removing HGV movements, particularly of waste. The retention of SIL and its potential intensification raises issues of the extent to which HGV movements may be maintained/increased. We understand there is uncertainty around which industrial uses could come forward. However, the risk of assessing on a case by case basis at planning application stage is that cumulative impacts may not be fully considered and opportunities to more comprehensively realign the road network missed. The Council notes that transport modelling hasn't been updated to take into account potential development scenarios. We are happy to work with the OPDC on this aspect to ensure no detrimental impacts for Harlesden in terms of increased HGV movements.	No change proposed. TfL produced a transport study that modelled a similar/higher quantum of development as proposed in the modified Local Plan, and this has informed OPDC's Infrastructure Delivery Plan and proposed upgrades to strategic roads and junctions taking into account cumulative impacts of development. As a strategic model, the recommendations from this are still considered to be fit for purpose for the purpose of identifying strategic impacts, as confirmed by TfL. OPDC has also produce a Preliminary Infrastructure Design and Costing Study which has developed specific transport intervention requirements to support and unlock the specific development sites which have been modified in response to the inspector's interim findings. The Local Plan identifies both new and enhanced routes that may be required into Old Oak North to support industrial intensification and that depending on the exact form of industrial intensification, contributions may be required towards enhancements to the strategic road network. more detailed transport assessments will be required as part of future planning applications in order to test, understand and mitigate the impacts of development proposals. There is the possibility that these assessments may highlight the need for an additional vehicular connection, which is safeguarded in the Infrastructure Delivery Plan.	N	
64	Local Authority	Ciara	Whelehan	London Borough of Brent	13		Employment				The Council strongly supports the Plan's focus on industrial intensification and co-location of industrial activities outside of SIL. The Industrial Land Review Addendum, which support the modified Plan, demonstrates that there is potential to deliver a net gain of 250,428 sqm of industrial floorspace capacity. This increase will help contribute towards meeting the ongoing demand for industrial space in the wider market area, including Brent. In light of Brent's significant need for further industrial floorspace as evidenced by the London Industrial Land Demand Study (October 2017) this is supported. Brent and OPDC will need to continue to work together to seek to maximise industrial capacity.	Noted.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	1		General	General			Ealing is supportive of much of the Plan particularly as this reflects the continuing joint work between OPDC and the Boroughs, however there are outstanding issues relating in particular to strategic issues of land supply. Comments on themes of particular interest are set out below and detailed notes on specific policies follow in tabular form at Appendix 1. Reflecting the supplementary nature of the current consultation these representations are in addition to those that Ealing made in the September 2017 and July 2018 consultations except where noted otherwise.	Noted.	N	

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65	Local Authority	Sam	Cuthbert	London Borough of Ealing	2A		Environment and Utilities		EU6		<p>2A. Ealing's previous representations have highlighted the inherent difficulty of industrial and waste planning in the absence of an apportionment for all LPAs including OPDC. This is unfortunately now exacerbated by the shift in the major focus of development to sites within Ealing. This relocation of development is across the borough boundary from LBHF into Ealing and therefore from one Borough apportionment to another. I understand that the OPDC's Industrial Land Review (ILR) allows OPDC to demonstrate a net gain in industrial capacity, and if it was working to a separate apportionment in which its full industrial needs were understood and set out then it might be possible to balance these against the gain and loss across its area. However, the needs that this land must meet are instead a subset of the composite industrial and waste apportionments of Ealing, Brent, and LBHF and are simply not understandable in relation solely to net gain or loss within the OPDC boundary. Ealing in particular faces a huge one-off loss of industrial capacity as a result of the modifications, with no reduction in either waste or industrial apportionments. This is primarily a failure of the London Plan process which has failed to implement apportionments for MDCs despite two inspectors' reports directing the Mayor to do so, and Ealing is keen to find the most constructive way forward through the present problem.</p>	<p>No change proposed. The setting of borough apportionment targets is a matter for the GLA through the London Plan and the adopted 2021 version does not include an apportionment target for OPDC. Policy SI8 states that Mayoral Development Corporations must cooperate with host boroughs to meet identified waste needs. OPDC is happy to continue to work with Ealing and the other host boroughs to understand how the OPDC area can help towards meeting waste needs.</p> <p>The Local Plan (policy EU6) reflects the West London Waste Plan position and safeguards waste sites in the area. Paragraph 6.70 (MM/PS2/OPDC/EU6/1) states that OPDC will work with the host boroughs and other waste planning authorities covered by the WLWP to adopt a new WLWP.</p> <p>The Industrial Land Review Addendum provides an indicative breakdown by borough of the net loss/gain of floorspace. For Ealing, there is a net gain of 55,685sqm of industrial floorspace.</p>	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	2B		Environment and Utilities		EU6		<p>2B. On waste matters specifically, Ealing has previously made representations on this matter at each stage of the OPDC Local Plan process, and most recently at the EIP hearing sessions (see Hearing Statement REP-30-001) in April 2019. It is noted that the Inspector's Interim Findings do not touch on these waste matters specifically, and so we await the full report. It is acknowledged that since April 2019, the new London Plan has now been adopted, and disappointingly for Ealing this fails to implement apportionments for each LPA. The policy as it now stands in the London Plan is profoundly flawed, and Ealing does not have the mandate at a borough level to respond to the borough apportionments. Whilst we do welcome the OPDC's commitment to joint working, and are similarly committed to a collaborative effort, we remain of the view that each LPA should have clarity over its responsibilities. For that reason, through our own emerging Local Plan we intend to redefine Ealing's apportionment figures at an LPA level, by disaggregating the London Plan borough apportionment figures. As stated previously, we would request that the OPDC does the same through your Local Plan. As well as assisting with remedying a flawed regional policy, this should also help with demonstrating how the OPDC's waste planning authority responsibilities, as set out in national planning policy on waste, are being met.</p>	<p>No change proposed. The setting of borough apportionment targets is a matter for the GLA through the London Plan and the adopted 2021 version does not include an apportionment target for OPDC. Policy SI8 states that Mayoral Development Corporations must cooperate with host boroughs to meet identified waste needs. OPDC is happy to continue to work with Ealing and the other host boroughs to understand how the OPDC area can help towards meeting waste needs.</p> <p>The Local Plan (policy EU6) reflects the West London Waste Plan position and safeguards waste sites in the area. Paragraph 6.70 (MM/PS2/OPDC/EU6/1) states that OPDC will work with the host boroughs and other waste planning authorities covered by the WLWP to adopt a new WLWP.</p>	N	

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65	Local Authority	Sam	Cuthbert	London Borough of Ealing	2C		Environment and Utilities		EU6		2C. The inclusion of the waste sites on maps is welcome, as is recognition of their safeguarded status and the need for compensatory provision, but such a mechanism is intended to operate in exceptional circumstances. This position is a given, and is already established through London Plan policy SI 9, the WLWP, and policy EU6, and so the repeated emphasis on this approach for a number of the site is of concern as it implies that the likelihood of this occurring is high. The new London Plan is clear at paragraph 9.9.2 that any release of current waste sites should be done as part of a plan-led process, and not on an ad hoc basis (i.e. through the Development Management process). The plan should not be actively planning for scenarios which have a high probability of triggering this mechanism, without also planning for a solution. As a strategic matter if the delivery of the strategy is contingent on such matters being resolved during the lifetime of the plan, then that shouldn't be passed to a separate development plan (joint waste plan), or left to the Development Management process. The local plan needs to give clarity around the future of these sites and demonstrate how the plan can achieve maintaining current capacity levels. In respect of OPDC's current plan, therefore, Ealing requests the agreement with OPDC of a clear apportionment of industrial needs and waste needs to enable a constructive way forward in both local plans	No change proposed. The Local Plan (policy EU6) reflects the West London Waste Plan and 2021 London Plan by safeguarding waste sites in the area, and provisions for compensatory provision. Paragraph 6.70 (MM/PS2/OPDC/EU6/1) states that OPDC will work with the host boroughs and other waste planning authorities covered by the WLWP to adopt a new WLWP. The process for developing a new WLWP could review all aspects of the adopted WLWP, including any policies and sites. The majority of the sites listed in the WLWP are located in Park Royal and within the designated Strategic Industrial Location (SIL) which remains protected for industry and these sites are not affected by the Plan. The modifications would still allow the potential for existing waste sites to be incorporated into the new developments. For example, the policy framework for Channel Gate allows for a mix of uses including industrial uses. There is sufficient land within this, including land not anticipated for housing led development, so there is the potential for existing waste uses to be incorporated. In cases where this is not possible, applicants will need to demonstrate that appropriate compensatory provision is being made elsewhere based on a sequential approach, starting with the OPDC area.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	3		Strategic Policies		SP7		Work on the West London Orbital has progressed significantly since the previous consultation and it would make sense to update references throughout the plan from WLO as a 'potential' project to a concrete proposal.	Noted. Greater emphasis has been given to the West London Orbital proposals, following the comments provided by the West London Alliance (see ref. 133/5-10).	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	4		Foreword / Introduction			1.19	Ealing's Planning for Schools DPD is adopted.	No change proposed. Borough Development Plan documents only form part of OPDC's Development Plan with the stage and weight they were afforded at the point that OPDC was established in April 2015, when OPDC then became the local planning authority for the area. Therefore, it is still only the draft Planning for Schools DPD which has weight within the OPDC area.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	5		Places		P4		Attention will need to be paid to integration of waste, industrial and other land uses. This could be outlined in more detail within this Local Plan (Park Royal West).	No change proposed. Policy E1 also applies to the Strategic Industrial Location (SIL) and this supports broad industrial type activities within SIL. The Local Plan (policy EU6) reflects the West London Waste Plan position and safeguards waste sites in the area. Policy P4 in conjunction with E1 and EU6 support waste provision in appropriate locations across the OPDC area.	N	

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65	Local Authority	Sam	Cuthbert	London Borough of Ealing	6		Places		P9		In relation to Channel Gate's reclassification as predominantly residential use, consideration should be given to re-provision or support of relocated employment land or services within other areas, perhaps under Policy P9, 'f' in relation to S106. This principle could also possibly be noted under Design, Principles for securing high quality design, 2. iv.	No change proposed. This would be managed through policies E2 and E4.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	7		Design			5.10	Design codes are mentioned for major outline or hybrid applications, clarity should be given as to whether these will be produced by the LPA or by applicants.	No change proposed. The proposed modifications did not amend this part of the Local Plan. The guidance is intended for applicants.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	8		Design			5.41	Tall buildings – there is an opportunity to include a positive statement here for skyline creation, this is alluded to in supporting text in paragraphs 5.41 and 5.42, but this could be stronger.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, London Plan policy D9 provides planning policy to ensure proposals make a positive contribution to the existing and emerging skyline and it is not considered suitable or effective to repeat this policy in OPDC's Local Plan	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	9		Environment and Utilities		EU6 b)		The inclusion of the word 'could' is helpful in recognising that the policy is seeking to maintain/secure the potential capacity position. The use of the word 'normally' however is not supported, as this may permit exceptions to a policy approach which is already established in the London Plan (SI 9). It would be helpful also if the policy through the supporting text qualified what is meant by enhanced compensatory provision, perhaps with regard to the waste hierarchy as per London Plan policy SI 9.	No change proposed. OPDC's Local Plan would be read in conjunction with the London Plan policy SI9 that refers to compensatory capacity at least meeting and should exceed the maximum achievable throughput of the site proposed to be lost. The reference to site provision which 'normally' meets the maximum throughput would allow for cases that exceed the maximum throughput in line with the 2021 London Plan. References to enhanced compensatory provision would be read in conjunction with the London Plan policy SI8 that includes a number of criteria against which proposals for new waste sites or to increase capacity of existing sites should be assessed against.	N	

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65	Local Authority	Sam	Cuthbert	London Borough of Ealing	10		Employment		E3 c)		Include note to address appropriate fit out, flexible terms and security of tenure that meet the needs of small businesses and start-ups.	No change proposed. Policy E3 seeks to secure an appropriate quantum of a different types of workspace to support small and start up businesses. The most appropriate type or nature of provision would be considered on a site by site basis, and secured by legal agreement. The level of fit out could be looked, alongside other issues, when assessing whether the type of nature of provision was appropriate. OPDC is also working on the Planning Obligations Supplementary Planning Document (SPD) which will include more detail on affordable workspace.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	11		Town Centre and Community Uses		TCC1	10.11	Clarify responsibility for the Vision Statement for town centres, is this for applicants or the LPA?	No change proposed. As set out in the paragraph 10.11, the vision statement should form part of a the Town Centre Uses Statement which should accompany development proposals which exceed that stated thresholds, and so should be prepared by the applicant.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	12		Town Centre and Community Uses		TCC1	10.11, 10.12	2,500sqm of town centre use is proposed elsewhere throughout OPDC, but this appears to now fall predominantly within North Acton as Atlas Junction has been omitted from the town centre list. Please clarify.	No change proposed. This threshold requirement of 2,500sqm will apply to any proposals outside of Old Oak Major Town Centre where a threshold of 5,000sqm will apply. This could include the North Acton neighbourhood town centre, Park Royal neighbourhood town centre, or proposals within any other part of the OPDC area.	N	
65	Local Authority	Sam	Cuthbert	London Borough of Ealing	13	Figure/PS2/OPDC/PM16	Environment and Utilities		EU6	Policies Map	The inclusion of polygons for all waste sites (existing and allocated) is welcome. We note however that the boundaries for some of the sites differ from those capture locally (on our interactive policies map). We can share these with you if helpful. We wanted to flag this up, but we recognise that as you have done this exercise after us your boundaries may be based on more up to date permit information etc.	Change proposed. The other (non allocated) sites identified the West London Waste Plan were listed but not mapped in the WLWP. Accurate boundaries are mapped on the LBE policies map and factual corrections will be made to reflect these existing boundaries.	Y	65/13

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	1A		General	General			LBHF is the largest Local Authority stakeholder in the OPDC by land area, and therefore have considerable interest in the adoption of a sound and effective plan that works for businesses, and residents both current and future. LBHF has engaged in the preparation of OPDC's draft Local Plan since the beginning, including the submission of representations to the version submitted to the Secretary of State in October 2018. the situation in the OPDC area has changed considerably, including the loss of a strategically important allocation and adoption of a new London Plan. With this in mind, LBHF welcome this set of modifications now the subject of consultation, however it is not accepted that these modifications go far enough to address this new reality. London Borough of Hammersmith and Fulham Council is the largest Local Authority stakeholder in the OPDC by land area, and therefore have considerable interest in the adoption of a sound and effective plan that works for businesses, and residents both current and future.	Noted. Please refer to OPDC's responses to LBHF's detailed comments.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	1B		General	General			The following statement follows representations on the emerging Plan and statements made to the Examination in Public (EiP). In these previous representations, LBFH was broadly supportive of the Plan but raised particular objection to building heights, densities, and massing along Scrubs Lane; Affordable housing; health and air quality; and road adoption and maintenance. These representations also raised issue with the deliverability of the Plan through the proposed phasing of infrastructure, and the generation of funds from CIL/S106 contributions – all matters that still do not appear to have been adequately addressed.	Noted. Please refer to OPDC's responses to LBHF's detailed comments.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	1C		General	General			Additionally, our representations also raised concerns with regard to the evidence base used to inform policy making in the Plan, and highlighted significant issues or shortcomings of the various studies. It is noted that none of these studies have been amended to reflect our earlier concerns, and this remains a significant concern as the evidence, or lack thereof, has been used to inform the revised strategy, development capacities and policy approach with errors or omissions in the former now reflected in the latter. These concerns have been reiterated in our representations in order to draw attention to the implications in respect of deliverability and effectiveness of the plan.	Noted. Please refer to OPDC's responses to LBHF's detailed comments.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	1D		General	General			Since the removal of the strategically important Car Giant allocation, officers from LBHF have engaged regularly with the OPDC to help shape the revised Plan in order to ensure the OPDC are able to meet their statutory obligations and ensure that the interests of residents in Hammersmith and Fulham are represented throughout. As such, the modifications proposed are broadly supported. In particular, LBHF supports the ambitious approach that the OPDC has demonstrated throughout the Plan toward health and well-being, a protected Wormwood Scrubs, healthy streets, support for low and zero carbon sustainable development, and strong future economic development of the area. Nonetheless, it is considered that some further amendments could improve the deliverability and effectiveness of the key policy objectives.	Noted.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	1E		General	General			Further amendments to the Plan are aimed primarily at ensuring the Plan is capable of delivering a coherent new neighbourhood for Old Oak North and Scrubs Lane that successfully integrates and respects the surrounding context, achieves a high quality sense of 'place' for new and existing residents and businesses, and circumvents predicted issues that are likely to arise. In summary, our representations relate to: <ul style="list-style-type: none"> • The proposed sites on Scrubs Lane and their suitability for tall buildings, the potential impacts on the neighbouring conservation and nature conservation sites including St Mary's Cemetery, Grand Union Canal, Wormwood Scrubs, and phasing issues relating to land ownership and relocation of existing occupiers in this area; • Land use proposals at Old Oak North and the inclusion of a less permeable road network through this area than was proposed as part of the previous (submission) Plan. In particular, there are significant concerns relating to east-west connectivity throughout the area, especially between Scrubs Lane, HS2, and the proposed Old Oak town centre; • Proposals at the North Pole East allocation in terms of building heights and the relationship with the site's surrounding context of Wormwood Scrubs, Little Wormwood Scrubs and St Mary's Cemetery. Additionally we question whether the phasing (0-5 years) is realistic given landownership and relocation of existing tenants to the SIL within OPDC; • Amendments to the HS2 Old Oak Station site and the justification for increased housing; • Proposed infrastructure changes, including the proposed linkages with Hammersmith and Fulham and the strategic infrastructure to deliver net zero development (e.g. a local decarbonised energy network; and • Proposed modifications in terms of amenity, and how these will deliver a coherent community whilst introducing industrial uses alongside new homes. 	Noted. Please refer to OPDC's responses to LBHF's detailed comments.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	2		General	General			The Council would like to be invited to participate in any further hearing sessions should the Inspector consider that these are necessary.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	3		General	General			Finally, although not a matter for the Examination, we would encourage the OPDC to continue close cooperation with LBHF following adoption of the Plan to ensure its effective and timely delivery. LBHF continues to seek an ambitious and bold regeneration of the OPDC area and consider that this can only be achieved through collaborative working that fully acknowledges the important role of the authority.	Noted. OPDC is committed to continue to work closely with borough colleagues in delivering the Local Plan's Spatial Vision.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	4		Development Capacity Study Update				<p>General – Sites have been identified in this study and the Local Plan for delivery within 0-5 years. It is our concern that whilst this could be achievable in most cases based on the deliverability criteria, the delivery of infrastructure is not programmed to meet the needs of incoming residents in these periods. For an opportunity area like this one which doesn't have existing infrastructure it is vital that social infrastructure and amenities are available in the earlier delivery periods. We would welcome some commentary in this document regarding the infrastructure phasing and how this has been factored into the site deliverability decision making.</p>	<p>No change proposed.</p> <p>The Infrastructure Delivery Plan (IDP) identifies timelines for delivery of all infrastructure projects, including for public realm and active transport infrastructure. This timelines have been informed by timelines for development sites, as evidenced by the Development Capacity Study (DCS) Update, which will either deliver, contribute towards or will need to be unlocked by these projects.</p> <p>The Social Infrastructure Needs Study Update provides further detailed information for the amount and phasing of social infrastructure to meet the needs of development based on the DCS Update information. This is reflected in the IDP</p> <p>The DCS Update makes reference to the IDP and vice versa. Infrastructure information relevant to site assessments are set out in DCS Update Appendix A.</p> <p>Policy DI2 (Timely Delivery and Optimised Phasing) clarifies that OPDC will look to secure the timely delivery of infrastructure required to support the needs of development.</p>	N	

66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	5	Development Capacity Study Update	3.11	<p>Para 3.11 – Whilst we do not disagree with the methodology to use permitted schemes in the area as a precedent for housing density, it must be acknowledged that such schemes were permitted when the vision for the area was fundamentally different to the modifications under scrutiny in this consultation. Such schemes would have been assessed based on the former Old Oak and Park Royal Framework together with the London Plan. Both documents were written based on the previous vision, objectives and capacity analysis for the area. On this basis, it would be of benefit to this study to either remove the use of permitted schemes in the area to help set density parameters or apply some sensitivity analysis to establish capacities and densities in the area that are more appropriate for the revised vision. This is particularly important for identified sites on Scrubs Lane that are now the focus of higher density residential led allocations and which have existing permitted schemes that are extremely high density and should not be a precedent for future development in these more sensitive locations.</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The DCS methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. These will enable people to reach a range of existing services and town centre uses in Harlesden, Kensal Green and White City.</p> <p>In addition to accessing existing services, the proposed modifications provide support for small scale walk-to town centre uses in clusters. The provision of town centre uses will provide services for both the community along Scrubs Lane and employees within Old Oak North.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The proposed modifications to Old Oak North are recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes.</p> <p>Scrubs Lane will be within a 15 minute walk of Old Oak Common Station and served by new and enhanced bus routes connecting the area to Harlesden, White City, Old Oak Common Station, North Acton and Park Royal. OPDC's Bus Strategy Update developed by TfL defines these bus routes.</p> <p>Proposed modifications to new and improved east-west walking and cycling routes are set out connecting Scrubs Lane to Old Oak North, Old Oak Common Station, Old Oak North, Old Oak Common Lane.</p> <p>These proposals show an improvement in PTAL levels and are shown in Figures 7.10 and Figure 7.11). The Local Plan requires car free development in areas of high transport accessibility as set out in Policy T4.</p> <p>Statements of Common Ground have been signed with landowners along Scrubs Lane demonstrating deliverability of development.</p>	N
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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	6		Development Capacity Study Update			3.13	Para 3.13 – We welcome the text here to suggest that the ranges are not pre-determined for development management purposes, however they do form indicative ranges in this study and the Local Plan mods and that will inevitably be interpreted as minimum indicative figures to be exceeded by developers.	No change proposed. Development proposals will be determined using relevant development plan documents and material considerations.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	7		Development Capacity Study Update			Section 6	We would query why the residential capacities are so low for these two sites (Site 59 - Park Royal Road & 60 Park Royal Road).	No change proposed. Development capacity for site 59 Park Royal Road West is based on planning permission 200031OPDFUL. Development capacity for site 60 5 to 7 Park Royal Road has been determined from development capacity modelling methodology set out in body of the DSC Update report considering site specific opportunities and challenges.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	8		Industrial Land Review Addendum				<p>General – The study does not revisit the original assessment of SIL boundaries and therein sites for retention/de-designation despite the acknowledgement of the significant change in context with the removal of Site Allocations 2 & 3 from the draft Local Plan. The Scrubs Lane sites are therefore not considered in the assessment of the priority areas at Section 4 and there is no comparison of provided of the Scrubs Lane sites and those shown on Figure 4. In particular, there is no assessment against the revised criteria (Table 3) or view provided in the study to enable a determination as to whether it would be more appropriate to de-designate all of School Road, and North and South of Chandos Road over de-designation of the Scrubs Lane sites, especially given the further changing context of residential development capacity coming forward at sites 3- 8 in Figure 3 and Table 1. This is a major shortcoming.</p>	<p>No change proposed. The Industrial Land Review Addendum (ILRA) was developed in response to the Inspector's Interim Findings and the recommendations to remove site allocations 2 and 3. The Interim Findings did not refer to or affect other sites along Scrubs Lane. Cargiant Scrubs Lane sites are discussed and considered in Section 2 of the report as this part of the report responds directly to the Inspectors Interim Findings and what the findings say in relation to site allocation 2. Specific reasons and a justification for the approach for the Cargiant Scrubs Lane sites is given in paragraph 2.9. Other SIL sites are only considered in section 4 because as a consequence of the Interim Findings, the loss of capacity in Old Oak North, would result in general conformity issues.</p> <p>We consider Scrubs Lane to be suitable for residential led development for a number of reasons:</p> <ol style="list-style-type: none"> 1. It has good connectivity (existing road access, bus routes along Scrubs Lane, within 800m from Willesden Junction station) which means that the proposed levels of development can supported. Scrubs Lane is also connected into the Kensal Canalside Opportunity Area in RBKC via the North Pole Depot site allocation, which is proposed to be redeveloped to deliver a minimum 3,500 new homes. 2. There are existing residential uses along Scrubs Lane, and additional residential development would be compatible with this 3. There are extant planning permissions for residential development (around 500 units) along Scrubs Lane, and they have started to be implemented. 4. The sites would be separated from the retained SIL in Old Oak North by the span of railway tracks and the agent of change would also apply to ensure the amenity of the occupiers 5. Scrubs Lane is in need of regeneration, new development would deliver better placemaking and response to the opportunities to improve this key link between our Opportunity Areas. 6. The updated Infrastructure Delivery Plan and Social Infrastructure Needs Study identified what is required to support development and how this will be funded, including infrastructure need along Scrubs Lane. <p>The Scrubs Lane sites referred to in the report would also be directly contiguous with other residential led development sites already proposed for de-designation along Scrubs Lane (they were not affected by the Interim Findings).</p> <p>The retention of Cargiant owned sites along Scrubs Lane as SIL was also assessed as a reasonable alternative of the proposed modifications IIA. The outcomes of the assessment were not as strong in terms of overall sustainability compared to the proposed modifications for the delivery of mixed use development on these sites. Therefore, this reasonable alternative has not been included in the Local Plan.</p> <p>OPDC has agreed a Statement of Common Ground with Cargiant confirming their support for the re-allocation of the Cargiant Scrubs Lane sites for housing-led mixed use development, confirming the deliverability of these sites during the Local Plan period.</p>	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	9		Industrial Land Review Addendum			2.8	Para 2.8 – acknowledges the need for relocation of operational uses within Cargiant's Scrubs Lane sites to Old Oak North. This should have been picked up and addressed in the Old Oak North Intensification Study. In particular, this should ensure the displaced industrial floorspace from Scrubs Lane is included in the base position and netted off from any calculation of net industrial floorspace gain to be achieved through the intensification of Old Oak North. We would welcome the opportunity to discuss such change, ideally before the February committee.	No change proposed. Paragraph 3.7 of the Old Oak North Intensification Study refers to an opportunity for the intensification of Old Oak North to mitigate for the loss of any industrial floorspace on the Scrubs Lane sites, including the sites used in conjunction with the main Cargiant operations in Old Oak North. The ILR Addendum is the document that includes the overall net calculation of industrial capacity. The focus of the Old Oak North Intensification Study is the intensification (net addition) of capacity, so please refer to the ILR Addendum when looking for net figures. The ILR Addendum includes industrial floorspace within the land being de-designated from SIL, so it will include relevant floorspace on the Scrubs Lane sites. Therefore, this is already accounted for in the overall net calculations.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	10		Industrial Land Review Addendum			2.9	Para 2.9 – this downplays the fact that the acceptability of Scrubs Lane for high density residential use was also contingent on the HIF funding package and regeneration of Old Oak North, with respect to the new transport infrastructure and amenities as described at para 2.4 that were to serve the area as a whole. In the absence of such strategic infrastructure investment, LBHF has concerns whether Scrubs Lane can support the quantum of residential development previously proposed let alone the even higher residential numbers now being advanced. In this context, it is very difficult to see how the distinction made to the ERM site (at paras 2.15 – 2.17) does not apply to Scrubs Lane or is not seen to adversely impact the proposal for Scrubs Lane (namely the ability to deliver high quality place-making, strategic sustainable connections, supporting social infrastructure and amenity requirements for the area)?	No change proposed. OPDC considers Scrubs Lane to be suitable for residential led development for a number of reasons: 1. It has good connectivity (existing road access, bus routes along Scrubs Lane, within 800m from Willesden Junction station) which means that the proposed levels of development can supported. It has good connectivity (existing road access, bus routes along Scrubs Lane, within 800m from Willesden Junction station) which means that the proposed levels of development can supported. Scrubs Lane is also connected into the Kensal Canalside Opportunity Area in RBKC via the North Pole Depot site allocation, which is proposed to be redeveloped to deliver a minimum 3,500 new homes. 2. There are existing residential uses along Scrubs Lane, and additional residential development would be compatible with this 3. There are extant planning permissions for residential development (around 500 units) along Scrubs Lane, and they have started to be implemented. 4. The sites would be separated from the retained SIL in Old Oak North by the span of railway tracks and the agent of change would also apply to ensure the amenity of the occupiers 5. Scrubs Lane is in need of regeneration, new development would deliver better placemaking and response to the opportunities to improve this key link between our Opportunity Areas. 6. The updated Infrastructure Delivery Plan and Social Infrastructure Needs Study identified what is required to support development and how this will be funded, including infrastructure need along Scrubs Lane.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	11		Industrial Land Review Addendum			Figure 2	Figure 2 – Query why all of the land on Scrubs Lane is currently allocated SIL but this figure only shows three parcels of land to be de-designated.	No change proposed. The Industrial Land Review Addendum (ILRA) was developed in response to the Inspector's Interim Findings and the recommendations to remove site allocations 2 and 3. Figure 2 relates to the site parcels covered by the Inspectors Interim Findings. All other land along Scrubs Lane was unaffected by the findings and are still proposed for release from SIL so it is not shown in Figure 2. The Table of Figure Modifications shows the proposed Strategic Industrial Location (SIL) boundary.	n	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	12		Industrial Land Review Addendum			4.16	Para 4.16 – Further discussion on the updated Development Capacity Study will assist in providing more detailed comments, but currently query why the residential capacities are so low for these two sites (West Park Royal Road & East Park Royal Road).	No change proposed. Development capacity for site 59 Park Royal Road West is based on planning permission 200031OPDFUL. Development capacity for site 60 5 to 7 Park Royal Road has been determined from development capacity modelling methodology set out in body of the DSC Update report considering site specific opportunities and challenges.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	13		Industrial Land Review Addendum			5.5	Para 5.5 – the last sentence needs to be clarified so that is explicit in that the sites proposed for de-designation from SIL will result in a loss of c. 294,168 sqm of industrial floorspace, and that the equivalent amount of industrial floorspace (294,168sqm) needs to be provided for through industrial intensification to reach a 'no-net loss' position.	No change proposed. Paragraph 5.5 does clarify the quantum of floorspace being lost and Table 11 demonstrates that this has been factored into the no net loss calculations.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	14		Industrial Land Review Addendum			5.7, Table 8	Para 5.7 & Table 8 – the figure provided for the Old Oak North sites is the gross floorspace figure. The net uplift in floorspace as derived from the Old Oak North Intensification Study was c.105,000sqm. Is it correct to assume the other figures quoted in Table 8 are also gross and not net uplift?	No change proposed. The development capacity figures (including those for Old Oak North) in Table 8 in the Industrial Land Review Addendum are expressed as Net Internal Area (NIA). The net uplift that could be achieved across the whole OPDC area if this development comes forward is in set out in Table 11 and 12 of the ILR. The existing industrial floorspace and potential development capacity figures for Old Oak North are set out in Table 3 of Old Oak North Intensification Study.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	15		Industrial Land Review Addendum			Table 9	Table 9 – suggests the figures provided are 'additional floorspace'. Having regard to the comment above and the findings of the Old Oak North Intensification study, H&F query whether this is 'additional' floorspace and not a gross floorspace figure.	No change proposed. The net position is in set out in Table 11 and 12 of the Industrial Land Review Addendum. This shows potential for a net uplift of 250,428sqm of industrial floorspace across the OPDC area.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	16		Industrial Land Review Addendum			5.10, Table 10	Para 5.10 & Table 10 – the report needs to clarify that the revised industrial baseline calculation at para 5.5 included the loss of all industrial floorspace from de-designated SIL sites to avoid any ‘double counting’ of new industrial floorspace that may come forward on these sites to ensure this can be considered as ‘net’ additional industrial floorspace.	No change proposed. Paragraph 5.5 and Appendix C of the Industrial Land Review Addendum is clear which sites have been included in the baseline. The net position is in set out in Table 11 and 12 of the Industrial Land Review Addendum. This shows potential for a net uplift of 250,428sqm of industrial floorspace across the OPDC area.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	17		Industrial Land Review Addendum			5.12, Tables 11 & 12	Para 5.12 and Tables 11 & 12 – the net uplift figures need correcting with respect to the net uplift floorspace figure provided for the intensification of industrial floorspace within SIL (see comment above re Para 5.7 and Table 8).	No change proposed. The development capacity figures (including those for Old Oak North) in Table 8 in the Industrial Land Review Addendum are expressed as Net Internal Area (NIA). The net uplift that could be achieved across the whole OPDC area if this development comes forward is in set out in Table 11 and 12 of the ILR. The existing industrial floorspace and potential development capacity figures for Old Oak North are set out in Table 3 of Old Oak North Intensification Study.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	18		Industrial Land Review Addendum			Appendix A	Appendix A – School Road – in the section of the assessment on ‘improved PTAL levels’ it highlights proximity to North Acton Station but does not mention it's close proximity to Old Oak North station and HS2. The existing PTAL is already high but will be significantly improved in the future. The same comment applies for the assessments of North of Chandos Road and South of Chandos Road that again will benefit significantly from an uplift in PTAL as a result of the new Crossrail & HS2 stations.	No change proposed. Appendix A does refer to the Old Oak Common Station in the School Road assessment.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	19		Old Oak North Intensification Study				General query – why has the Intensification Study been limited just to Old Oak North? Officers understood that intensification of the industrial use in Old Oak North was in part tied to the relocation/displacement of the industrial uses from Scrubs Lane and its release from SIL? The study makes no mention of the uplift in floorspace being required to accommodate displaced industrial uses. This is critical as it should also have informed the typologies work, ensuring displaced industrial uses from Scrubs Lane can afford and operate in the intensified floorspace to be delivered at Old Oak North.	No change proposed. The Study is limited to Old Oak North because, in response to the Inspectors Interim Findings, OPDC is proposing to retain Old Oak North as Strategic Industrial Location (SIL) and we need to consider its potential to deliver industrial intensification. The other areas of SIL have already been considered in the Park Royal Intensification Study. Para 3.2 lists the existing types of activities taking place and para 2.9 explains the future growth sectors that we anticipate will grow and be attracted to the area. The typologies selected are flexible enough to accommodate a range of uses. Paragraph 3.7 of the Old Oak North Intensification Study refers to an opportunity for the intensification of Old Oak North to mitigate for the loss of any industrial floorspace on the Scrubs Lane sites, including the sites used in conjunction with the main Cargiant operations in Old Oak North. The Industrial Land Review Addendum (ILRA) Addendum is the document that includes the overall net calculation of industrial capacity for the whole OPDC area. The focus of the Old Oak North Intensification Study is the Intensification capacity, so please refer to the ILRA for net figures. The ILRA demonstrates a net uplift overall across the OPDC area.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	20		Old Oak North Intensification Study				General query – it is unclear what the catalyst is for intensification of the industrial land? Old Oak Common has been in industrial use for decades. There has been no policy restriction on intensification, but land use density has changed little.	No change proposed. Cargiant has publicly stated their intention to remain and intensify their site as part of the Local Plan examination process. The modifications will also provide specific policy support for industrial intensification. Network Rail are also likely to market the EMR site in the near term.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	21		Old Oak North Intensification Study			1.3	Para 1.3 – "... OPDC's proposed modification to re-instate SIL designations ..." should this not say 'retain' rather than 're-instate' as the existing SIL designation applying to Old Oak North has never formally be removed.	No change proposed. Paragraph 1.3 refers to proposals to retain Old Oak North as Strategic Industrial Location.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	22		Old Oak North Intensification Study			2.2	Para 2.2 – Update is needed to acknowledge that B1c is now E use class. New Use Class E and SIL protection: officers would welcome the opportunity to discuss how this may impact on industrial capacity in the OPDC and wider area. Will this be flagged up in the Modifications under Risk to Delivery of the Plan?	No change proposed. Paragraph 2.3 refers to new class E. It notes that B2 and B8 use classes remain as separate use classes. The typologies considered in this report will support industrial uses that are appropriate in SIL.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	23		Old Oak North Intensification Study			3.6, 3.7	Paras 3.6 & 3.7 – This appears not have regard to the residential development proposed for Scrubs Lane in respect of 'sensitive residential uses. Officers suggest clarification and further justification on this point.	No change proposed. Paragraph 3.6 does refer to proposals for new residential development along Scrubs Lane. A span of railway tracks would separate Old Oak North from development along Scrubs Lane. The agent of change would also apply to ensure the amenity of the occupiers (policy D5).	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	24		Old Oak North Intensification Study			Figure 4	Figure 4 – acknowledges that the Grand Union Canal is a defining feature that should be enhanced. However, it is unclear how intensification of industrial use would achieve this opportunity noting that current uses, which are proposed to be retained, have been adjacent to this feature since they established and have not sought to address or enhance the Canal to date. Regeneration elsewhere along the canalside has required a change in use (mixed-use).	No change proposed. Previous planning policy documents did not expressly specify that the canal in this location should be enhanced. Policies P3 (Grand Union Canal), D1 (Public Realm), D3 (Well-designed buildings) and D7 (Heritage) would apply to any proposals under this new Local Plan. These set clear criteria for how we will assess development in order to ensure that the Canal is conserved and enhanced.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	25		Old Oak North Intensification Study			Figure 5	Figure 5 – it is disappointing that none of the placemaking examples are of industrial intensification, rather most show a diversification away from industrial use	No change proposed. The examples are show a range of place making opportunities i.e. active or positive frontages, materials, signage, public realm etc. The examples include industrial examples such as Blackhorse Lane. Industrial intensification precedents are shown in Appendix 1.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	26		Old Oak North Intensification Study			Figure 6	Figure 6 – it is unclear what is meant by “Ensure future local character is informed by the area’s existing heritage including the railways, Grand Union Canal and industrial heritage”	No change proposed. Policies P3 (Grand Union Canal), D1 (Public Realm), D3 (Well-designed buildings) and D7 (Heritage) would apply. These set clear criteria for how we will assess development against these objectives.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	27		Old Oak North Intensification Study			5.3	Para 5.3 –the proposal here is not to intensify just a single industrial site or plot but rather 22ha of land in industrial use. Therefore, having regard to the NPPG statement, the study needs to draw on examples of large industrial area intensification rather than just one-off development schemes.	No change proposed. Industrial intensification is a new concept in the UK, and we have included the information we could find on examples of existing development schemes from the UK and elsewhere. The Place making principles have been used to ensure considerations go beyond the site level and take a view of the Old Oak North wide opportunities for better public realm, connectivity etc.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	28		Old Oak North Intensification Study			5.5	Para 5.4 – where is the ‘feasibility’ and ‘deliverability’ of what’s being proposed addressed in the methodology? Noting the comment above to Para 5.3, the typology derived plot ratios and development capacity needs to be based on precedents of area wide industrial intensification not one-off intensification of a solitary industrial site, otherwise, as already stressed at para 5.10, this is very much a hypothetical exercise, which again highlights the need for feasibility and deliverability assessment. How is it proposed to maintain the operation of existing industrial uses within the SIL during the intensification of sites? Will intensification lead to displacement of some existing uses? If so, is a relocation strategy required? Can the existing uses operate in 5+ storey intensively used industrial buildings?	No change proposed. Separate viability assessment has been completed as part of the Strategic Site Allocations Viability Assessment. The majority of the site is in a single ownership. Para 3.2 lists the existing types of activities taking place and para 2.8 explains the sectors that we anticipate will grow and be attracted to the area. The typologies are flexible enough to accommodate a range of industrial uses. We have Statements of Common Ground with the key landowners confirming the deliverability of the intensification targets.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	29		Old Oak North Intensification Study			5.11, Table 4	Para 5.11 & Table 4 – mention is made throughout to the intention of Cargiant to intensify, but have any of the landowners confirmed they want/can deliver/occupy the uplift of 105,000sqm?	Noted. The majority of the site is in a single ownership (Cargiant). Cargiant has publicly stated their intention to remain and intensify their site as part of the Local Plan examination process. We have also discussed the modifications with the other landowners, including EMR and Network Rail. Please refer to agreed Statements of Common Ground for further information. The Industrial Land Review Addendum (ILRA) is the document that includes the overall net calculation of industrial capacity for the whole OPDC area. The focus of the Old Oak North Intensification Study is the Intensification capacity, so please refer to the ILRA for net figures. The ILR Addendum demonstrates a net uplift overall across the OPDC area. The net position is in set out in Table 11 and 12 of the ILRA.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	30		Scrubs Lane Development Framework Principles Update				Revisions to the Scrubs Lane Development Framework are acknowledged by LBHF. However, there are two key areas of concern relating to the updated vision and principles for the Hythe Road Cluster. Improved Local Connectivity - Identifying this area and particularly the Hythe Road/Scrubs Lane junction as an area for improved local connectivity as an ‘all mode route’, appears a well-founded principle overall. Given the constraints of the existing junction, in-terms of site levels and existing railway infrastructure; significant safeguarding and set-backs of development would be required to achieve this desire. The supporting principles or development and framework plan for this area require strengthening to achieve these desires. Safeguarding of land to achieve these desires should be incorporated as a principle within this study.	No change proposed. Policy P10C3 will also be implemented alongside policy SP10€ that safeguards land to deliver infrastructure identified in the Local Plan and IDP. This includes the walking and cycling infrastructure proposed along Hythe Road and Scrubs Lane.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	31		Scrubs Lane Development Framework Principles Update				<p>Creation of a tall building cluster – Through the Development Management process, LBHF have raised objections to the scale of new tall buildings within Scrubs Lane and the intensification of the Hythe Road cluster, bringing forward a tall building both north and south of Hythe Road to a similar scale appears poorly founded and could limit opportunities to improve the pedestrian experience within this area. Views 1 and 5 within the updated study, illustrate moderate to major townscape impacts, resulting from this approach; alongside significant impacts upon the Cumberland Park Factory Conservation Area; as such LBHF would recommend review of this approach.</p>	<p>No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. These will enable people to reach a range of existing services and town centre uses in Harlesden, Kensal Green and White City.</p> <p>In addition to accessing existing services, the proposed modifications provide support for small scale walk-to town centre uses in clusters. The provision of town centre uses will provide services for both the community along Scrubs Lane and employees within Old Oak North.</p> <p>The principle for delivering clusters and coordinating the location of tall buildings in clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. OPDC considers the proposed modifications to the Hythe Road Cluster policy to deliver two tall buildings within the cluster is justified and sound. The modification for two tall buildings is appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road as the existing route into Old Oak North that will be enhanced. This is set out table 4.2.</p> <p>Paragraph 4.206 confirms that any tall building here will be subject to detailed assessments of their impacts in accordance with all relevant policy and guidance. This will include considering the impacts of surrounding heritage assets, consideration of local views and impacts on the surrounding townscape and movement network alongside micro-climate considerations. OPDC's Local Plan and the 2021 London Plan set out a series of policies to inform this process.</p> <p>Statements of Common Ground have been signed with landowners along Scrubs Lane demonstrating deliverability of development.</p>	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	32A		Social Infrastructure Needs Study Update				<p>LBHF are pleased to see that changes that were suggested have been incorporated, removing the need for a new secondary school and reducing the size and delaying the proposed primary from 4 to 3 forms of entry and pushing it back to 2031. This will also serve pupils from neighbouring boroughs, and if the plans progress as proposed it is considered sensible for that time line. Given the sensitivity around projections for primary school places and nursery places (ie. shorter lead in time for projections given the age of the children) it is very difficult to accurately predict need. On this basis there must be flexibility within the infrastructure delivery to address population changes that would result in increased need. With this in mind thorough monitoring and regular co-operation between the planning authorities on this matter will be very important.</p>	<p>Noted. Policy TCC3 (Social Infrastructure) notes that while social infrastructure requirements identified in the plan are based on the most up date modelling, flexibility for on-site provision of social infrastructure will be required as development progresses needs will need to be kept under regular review.</p>	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	32B		Tall Buildings Statement Update			2.8	Setting a definition of 15 storeys or 48 metres above ground level to define tall buildings is considered problematic and does not recognise that across the plan area, there are a distinct range of sites proposed for development. This approach is identified by the variation between the range of shoulder heights set-out in the other OPDC Local Plan supporting studies recommendations and tall building precedents. LBHF recommend using the lower level of shoulder heights within the range suggested within section 2.8 to establish the definition of tall buildings across the plan area. In this regard using a benchmark of 8 storeys, (25.6 metres) as an appropriate shoulder height; and applying the suggested uplift of 3 additional storeys; would define a tall building as either 11 storeys or 35.2 metres above ground level. This would enable additional scrutiny of tall buildings across the plan area in terms of design, heritage, environmental and townscape implications. Without such an amendment many of the sites identified through the place-based chapters of the draft Local Plan may fall outside of this additional scrutiny; and reliance upon the provisions of policies D3, D4, D5 and D6 appear poorly weighted to require developers to consider these additional impacts throughout the Development Management process.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, OPDC considers the methodology for defining a tall building and resultant definition as evidenced in the Tall Buildings Statement is justified and sound. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	33		Infrastructure Delivery Plan			Tables 4.1-4.6	It is concerning that tables 4.1-4.6 in the IDP for bus and rail infrastructure, road infrastructure, pedestrian and cycle connections, utilities projects, green infrastructure/open space and social infrastructure state that funding is "not committed". By virtue of funding being "not committed" there is no assurance that these vital projects are deliverable and thus render the Plan ineffective. More detail is required on where, how and when this funding will come forward. Additionally, there is no detail explaining funding has been affected by the COVID-19 pandemic and what adjustments (if any) have been made to factor in the associated economic downturn.	No change proposed. Unless a project is either being delivered or has funding secured through an implemented S106 agreement, or has a commitment of funding/delivery from some other source, then it is considered "not committed" for the purposes of the Infrastructure Delivery Plan (IDP). Just because a project is considered not-committed, does not mean that it is un-deliverable. Such projects are likely to be delivered/funded from planning obligations from deliverable development sites identified in the Development Capacity Study (DCS), or through other funding sources which have been identified in the IDP. Projects not identified as necessary to support the delivery of homes and jobs identified within the Local Plan period are identified as desirable in the IDP. The Local Plan is set to be delivered over a 20 year period, and it is recognised that delivery will be subject to a number of economic cycles within this period. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to embed requirements to support the recovery from Covid.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	34		Infrastructure Delivery Plan				There is an ongoing feasibility study for a new rail link between Brent Cross and Hounslow via Old Oak. However, Chapter 11 of the OPDC Local Plan nor the IDP makes no mention of the West London Orbital Line which is likely to unlock significant growth in the area. If this project were to get the green light, it could have implications for the phasing of development in the area, as well as significant funding implications. This project must be acknowledged and accounted for in the IDP	Change proposed. The IDP has been amended in relation to the West London Orbital in response to comments from the West London Alliance. Please see comment references 133/11 and	Y	113/11

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	35		Bus Strategy				The revised Bus Strategy (2021) dismisses further bus routes that would have improved connections to the rest of Hammersmith and Fulham including an extension of route 72 to Old Oak Common Station which was considered to be a low cost option in previous studies. Whilst the extension of the 220 route is welcomed this will be longer for passengers. Is there potential to incorporate the extension of the 72 route during a later phase of development? Could more be done to improve connections to Shepherd's Bush over the plan period that would facilitate local trips and compliment walking and cycling provision?	No change proposed. The bus strategy has been prepared by TfL using data of bus patronage and modelling of London wide routes, with the bus route 220 extension considered appropriate to connect the OPDC area to the rest of Hammersmith, including Shepherd's Bush. However, the bus strategy is a snapshot in time and bus routes and networks in London are continually evolving. It may be considered nearer the time of implementation that the extension of bus route 72 is more appropriate. Any changes to the bus network will be discussed between TfL, OPDC and the boroughs.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	36		Bus Strategy				Old Oak North was removed from the OPDC's delivery plan as a result of comments made in the inspectors report on the OPDC's latest Local Plan submission. Old Oak North represents the majority of infrastructure and housing that was previously planned within Hammersmith and Fulham. Since the removal of Old Oak North from the OPDC's plans, the OPDC have suggested that infrastructure priorities will be revised and focus shifted to the 'Western Lands'. Western Lands refers to the OPDC's intention of intensifying the delivery of housing in Ealing and Brent.	No change proposed. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area, which covered Brent, Ealing and Hammersmith & Fulham. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal. Residents and employees in Hammersmith and Fulham will also benefit from the proposed improvements to Willesden Junction Station.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	37		Bus Strategy				The OPDC have not published an updated strategic Transport Strategy for at least 5 years, which would inform supplementary documents such as the recently published Delivery Plan (2021) and the Bus Strategy Update (2021). The Highway Authority have significant reservations over the validity of the OPDC's Transport Strategy, strategic planning and funding of infrastructure.	No change proposed. TfL produced a transport study that modelled a similar/higher quantum of development as proposed in the modified Local Plan, and this has informed OPDC's Infrastructure Delivery Plan and proposed upgrades to strategic roads and junctions taking into account cumulative impacts of development. As a strategic model, the recommendations from this are still considered to be fit for purpose for the purpose of identifying strategic impacts, as confirmed by TfL. OPDC has also produce a Preliminary Infrastructure Design and Costing Study which has developed specific transport intervention requirements to support and unlock the specific development sites which have been modified in response to the Inspector's Interim Findings.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	38		Channel Gate Development Framework Principles				The Channel Gate site lies outside of the Hammersmith and Fulham Borough Boundary, but the framework principles established in this document are important for the rest of the OPDC area. It is one of several newly identified sites within the OPDC Local Plan modifications charged with delivering a mix of residential, commercial and community uses. We welcome and support the connections proposed between this site, the Grand Union canal and the HS2 station complex, however, the Channel Gate site amenities will likely remain detached from similar site allocations along Scrubs Lane. Whilst each will form neighbourhoods in their own right, the opportunity for shared amenities and open space is unfortunately lost in this new vision. The implications of such are a reduced sense of place and duplication of amenities and infrastructure at a higher cost which hasn't been fully accounted for in the Infrastructure delivery plan.	<p>No change proposed. OPDC considers that the Local Plan has been positively prepared, is effective and results from a justified plan-led process that will deliver sustainable development and achieve the Local Plan's Spatial Vision.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p> <p>The amended infrastructure requirements set out in the proposed modifications result in a smaller infrastructure funding gap.</p> <p>OPDC doesn't consider that the proposed modifications to social infrastructure provision will result in duplication. The quantum of these uses is required to meet the needs of the development and is evidenced in the Social Infrastructure Needs Study Update.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has been working closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These components will result in a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11. This will enable residents to access a range of services in uses within and around both places.</p>	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	39		Channel Gate Development Framework Principles				We understand that the Channel Gate site remains in multiple landownerships with no guarantee that the land parcels will come forward for development during the plan period. We are aware of the work the OPDC is doing with the landowners to pave the way for release of the various land parcels, but this still leaves question marks over whether this site can be delivered as alluded to in the Local Plan.	<p>No change proposed.</p> <p>The land at Channel Gate has been identified as deliverable through OPDC's Development Capacity Study (DCS). Further to this, OPDC has signed statements of common ground with all major land owners within the site allocation, both public and private, where landowners have outlined their support for the land to be identified for development in line with the Local Plan. One site is now in pre-applications discussions for development. The majority of Channel Gate is in public sector ownership.</p>	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	40	MM/PS2/OPDC/SV/6	Spatial Vision				Dispute naming new station at Old Oak Common Lane as 'potential'. This has been identified as 'Desirable' in the IDP, yet it is unclear how development around this 'desired' station can be described as 'transit orientated' if no station is guaranteed. Land for the station has also been safeguarded under Policies P7 and P7C2, and para 4.121 where it is acknowledged that the station is necessary for London's strategic transport needs. In order to fully support the development of the OPDC area, and support London's wider growth potential, OPDC must commit to this station and its delivery outside of the plan period, or earlier if possible. Where delivery is possible, this could be achieved successfully through an area Development Plan Document (DPD) or Supplementary Planning Document (SPD). Suggested change: ... other potential-rail stations to be delivered outside the plan period, or earlier where this is possible ...	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project.	Y	133/5; 133/6; 133/8; 133/9

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	41	MINOR/2/SP2/11	Strategic Policies		SP2		The addition of the principle of environmental net gain and mention of the government's 25 Year Environment Plan is supported.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	42	MM2/PS/Q3b	Strategic Policies		SP3 d)		The removal of SP3(d), which required a Health Impact Assessment (HIA) for major development proposals, from the policy is not supported. It is considered that the removal of this requirement and reinsertion into paragraph 3.19 is not justified and significantly reduces the effectiveness of policy SP3, and the health and wellbeing safeguards within the plan. LBHF request that the requirement for HIAs for major development proposals is retained within policy SP3.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan. Local Plan policies for improving health and reducing health inequalities continue to be justified, effective and sound.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	43	MM/PS2/OPDC/SP/8	Strategic Policies		SP4		Spelling mistake/typographical error. [...] and that at least 13,670 new homes are deliverable within the 2021 London Plan 0-10 year period (2019-29)	Change proposed. Typographical error corrected.	Y	66/43
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	44	MM/PS2/OPDC/SP/10	Strategic Policies		SP5		Identification of Old Oak North as Strategic Industrial Land (SIL) in policy SP5 as outlined elsewhere in the modified plan is supported.	Noted.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	45	MM/PS2/OPDC/SP/18	Strategic Policies		SP6	3.39	Object to the insertion of “and in particular Old Oak” to paragraph 3.39. Old Oak is no longer considered possible as a new cultural centre by LBHF while significant portions of Old Oak North remain SIL. Request the removal of “and in particular Old Oak” from paragraph 3.39.	No change proposed. This wording has already been removed from paragraph 3.39. See modification MM/PS2/OPDC/SP/18. Old Oak South remains an appropriate location for cultural uses.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	46	MM/PS2/OPDC/SP/38	Strategic Policies		Table 3.1		The updating of the site capacity tables is welcomed and supported.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	47	MINOR/ 2/P7C2/7	Places		P7C2 d)		Policy P7C2 d): Provide increased certainty for a new station at Old Oak Common Lane by committing to a new station to be delivered outside of the plan period....: a potential new Old Oak Common Lane Station <u>to be delivered outside of the plan period, or earlier if possible.</u>	No change proposed. The Old Oak Common Lane Overground station has a strong strategic business case. Its delivery is therefore supported during the Local Plan period subject to funding being secured. The station's delivery is safeguarded within the Local Plan and its phasing is shown within the Local Plan period within the IDP, as per the further proposed modification made in response to comment 133/12.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	48	MM/PS2/OPDC/P3/13	Places		P9		Please refer to our comments on modifications MM/PS2/OPDC/EU1/1 & MM/PS2/OPDC/EU1/2. The proposal to locate a second park at Channel Gate is supported	Noted.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	49	MM/PS2/OPDC/P7C2/1	Places		P7C2	4.128	Para 4.121: It is acknowledged that the station is necessary for London's strategic transport needs. In order to fully support the development of the OPDC area, and support London's wider growth potential, OPDC must commit to this station, accepting its delivery outside of the plan period if necessary.	No change proposed. OPDC and TfL strongly support the delivery of Old Oak Common Lane Overground station and the station has a strong business case for investment. TfL is engaged in discussions with national government, HS2, Network Rail and others in relation to funding the station.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	50	MM/PS2/OPDC/P7C2/1A	Places		P7C2 a)		Reference to Class E uses that support the town centre designation are supported.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	51	MM/PS2/OPDC/P10/7	Places		P10 e) v		Policy P10 e) v should be strengthened to encourage safeguarding of land to deliver meaningful interventions at key junctions/clusters within Scrubs Lane: <u>Safeguarding land to improve existing and create new east-west routes at each cluster</u> and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak South, the Grand Union Canal, St. Mary's Cemetery and Kensal Canalside Opportunity Area;	No change proposed. Policy P10C3 will also be implemented alongside policy SP10e that safeguards land to deliver infrastructure identified in the Local Plan and IDP. This includes the walking and cycling infrastructure proposed along Hythe Road and Scrubs Lane.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	52	MM/PS2/OPDC/P10/22	Places		Table 4.2		LBHF consider the amended text needs further changes to link this to our suggested change to the tall building definition to enable this to be managed this through the DM process: The exception to this approach is the Hythe Road cluster where additional <u>large/tall buildings may, subject to further justification</u> be appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road as the existing route into Old Oak North that will be enhanced.	No change proposed. OPDC considers the proposed modifications are sound and further amendments are not required. Table 4.2 sets out the justification for the two tall buildings in the Hythe Road cluster to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road as the existing route into Old Oak North that will be enhanced. Further justification for tall buildings along Scrubs Lane is set out in the Scrubs Lane Development Framework Principles Update supporting study. Consideration of massing is facilitated through policy D3.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	53	MM4/PS/Q3g	Design		D4	5.40	LBHF are concerned that setting a definition of 15 storeys or 48 metres above ground level to define tall buildings is considered problematic and does not recognise that across the plan area, there are a distinct range of sites proposed for development. This approach is identified by the variation between the range of shoulder heights set-out in the other OPDC Local Plan supporting studies recommendations and tall building precedents. LBHF recommend using the lower level of shoulder heights within the range suggested within section 2.8 to establish the definition of tall buildings across the plan area. In this regard using a benchmark of 8 storeys, (25.6 metres) as an appropriate shoulder height; and applying the suggested uplift of 3 additional storeys; would define a tall building as either 11 storeys or 35 metres above ground level. This would enable additional scrutiny of tall buildings across the plan area in terms of design, heritage, environmental and townscape implications. Without such an amendment many of the sites identified through the place-based chapters of the draft Local Plan may fall outside of this additional scrutiny; and reliance upon the provisions of policies D3, D4, D5 and D6 appear poorly weighted to require developers to consider these additional impacts throughout the Development Management process. Amend supporting paragraph 5.40 as follows: 'Tall buildings within the OPDC area are defined as those above 11 storeys or 35 metres above ground level.'	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, OPDC considers the methodology for defining a tall building and resultant definition as evidenced in the Tall Buildings Statement is justified and sound. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	54	MM2/PS/Q3j	Design		D7 d)	5.65	Policy D7(d) includes provision in relation to the 'commitment to the construction of a replacement building' which is welcomed by LBHF. It recommended that the policy wording be updated to make a clear reference to recording of the asset. It is also suggested that the supporting text in Paragraph 5.65 accompanying this policy is also updated, to define how an applicant will be expected to make this commitment; use of conditions or legal agreement to only undertake demolition once a building contract has been submitted to and agreed by the LPA. Amend the wording of Policy D7(d) 'proposals to demolish a building in a Conservation Area will only be permitted after approval of and commitment to the construction of a replacement building, <u>alongside the relevant recording of the existing building;</u> ' Amend the wording of Paragraph 5.65 'Where possible, proposals should demonstrate intent of implementation, <u>through submission of a building contract either as part of a planning obligation or condition.</u>	No change proposed. Conservation areas benefit from appraisals that appropriately record elements that contribute to the heritage asset's significance. OPDC considers these appraisals would appropriately record any relevant element of the conservation area that has been permitted to be lost. No change proposed. The proposed modifications did not amend paragraph 5.65. Nonetheless, the current supporting text is considered to be sufficient to secure intent of implementation.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	55	MM2/PS/Q3j	Design		D7	5.63	Amendments to Paragraph 5.63 of the supporting text to this policy is problematic, with the statement 'ensuring the relevant lost asset informs the character of new development'. This approach requires clarification to avoid delivery of poor quality, pastiche forms of development.	No change proposed. The proposed modification is considered to be sound. Policies D3 and SP9 will be implemented to ensure proposals respond positively to the character of the existing context and/or positively contribute to the delivery of new positive character.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	56	MM/PS2/OPDC/EU1/2	Environment and Utilities		E1		LBHF are concerned by the proposal to provide two reasonable size parks rather than the original three. It is considered that the loss of this park has not been fully justified given that housing targets in the plan have not been substantially reduced. It appears that in order to mitigate the loss of this third park the Plan proposes smaller spaces and 'pocket parks'. LBHF do not consider that these smaller spaces provide the same benefits or functionality of larger parks and therefore do not make up for the loss of this third park. Larger parks, such as the one now proposed at Channel Gate, provide substantial societal benefits acting as the heart of the community with freedom to roam which in-turn benefits community health. Furthermore, these larger parks provide significant ecological benefits with space for mature trees and grassland. LBHF encourage the Inspector to reject this modification due to a lack of justification.	No change proposed. Due to the proposed retention of the Old Oak North as SIL, it is no longer deliverable to provide the two Local Parks that were previously proposed for this place, one of which was to be centred on the Grand Union Canal and form part of an expanded Birchwood Nature Reserve within Old Oak South. A proposed new Local Park has been identified for the Channel Gate place to support that new community, in addition to the Local Park being proposed adjacent to Old Oak Common Station. New communities at North Acton and Acton Wells will be within the same distance of a Local Park as they were previously in the submission Local Plan, while the Channel Gate local park will be closer to North Acton than the previously proposed Old Oak North local park. While the number of Local Parks to be delivered within the plan period is reduced from three to two, the requirement for 30% of the developable land outside of the SIL to be delivered as publicly accessible open space remains. The same amount of overall public open space is to be provided as was previously proposed, though more of this will now be delivered through smaller public open spaces.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	57	MM5/PS/Q3k	Environment and Utilities		EU3		Policy text – the commitment to discharge surface water run-off into the Grand Union Canal has been moved from 1st to 3rd place in the Drainage Hierarchy. The reasoning behind this modification is unclear and this is not supported by LBHF. This move looks as if this option is now behind “below ground storage” of stormwater in the hierarchy which ultimately will be discharged to the sewer. However, a 4th element has been added to the Hierarchy which relates to “controlled release of water into the combined sewer through agreement with the borough and Thames Water”, and this should refer to the Lead Local Flood Authority as well. LBHF no longer consider the hierarchy to be consistent in its amended form due to the reference to 'below ground attenuation' in the 1st bullet-point. This is confusing and contradictory. The reason given for making the changes is “To ensure the effectiveness of the Plan by including as policy, requirements only referred to in the supporting text”, but the change just moves Policy text from one place to another. The modification is not justified nor effective and therefore should be rejected.	No change proposed. The change in the hierarchy was agreed as a modification with LBHF through a Statement of Common Ground in April 2019 (OPDC-SOCG-003 Matter 12 SoCG) and was presented to and agreed by the Planning Inspector.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	58	MINOR/PS/OPDC M12 (1)	Environment and Utilities		EU3	6.38	Para 6.38: Text inserted in relation to the greenfield run-off rate although it recognises that the rate will vary significantly across the OPDC Area. LBHF do not raise issue with the inclusion of this text, but the “Reasons” text in the Table of Mods says this text clarifies “that there is a single run-off rate applicable to the OPDC area”. This is disputed by LBHF– it does the opposite of this. We are concerned that this reasons text might be used by developers to justify higher discharge rates than are acceptable.	No change proposed. There being a single run-off rate was discussed and agreed at the examination hearings in April 2019 and as a hearing action, the Inspector requested that OPDC include text as a modification noting what this was.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	59	MM2/PS/Q3I	Environment and Utilities		EU4		Text added at the beginning of the Policy to clarify that demolition and construction phases as well as operation of the development once built are important in terms of minimising air pollution impacts is supported. However, the requirement to submit an Air Quality Assessment and the text summarising what this should include has been removed entirely. The deleted text has instead (In part) been put into the Supporting Text section in Para 6.45. Unclear why this is being deleted from the Policy - would have thought this is an important part of the Policy itself as it sets requirements. Could be argued that the new approach is weaker...The supporting text says AQ Assessments "should be submitted" does this have the same strength as the previous wording in the Policy? The Table of Modifications reason for these changes is given as "To ensure the effectiveness of the Plan", but don't see how these changes would do that.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	60	MINOR/2/EU4/3	Environment and Utilities		EU4	6.54	Para 6.55 refers to the London Environment Strategy which commits to setting new AQ targets with the aim of meeting WHO air quality targets. LBHF welcome this.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	61	MMX/PS/Q3	Environment and Utilities		EU5		The main proposed change for EU5 is to delete the Policy text relating to the requirement for an Assessment of Noise and Vibration to be carried out. However, there is still supporting text at Para 6.6.1 saying that the OPDC will "require all major development or developments that are particularly sensitive to noise and/or vibration to undertake a Noise and Vibration Assessment", however by removing this requirement from the Policy, it is considered that ability to enforce this requirement has been weakened. The submitted Table of Modifications reason for these changes is given as "To ensure the effectiveness of the Plan", yet we struggle to see how this modification has made the Plan more effective.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	62	MMX/PS/Q3	Environment and Utilities		EU5	6.61	Para 6.62 – extra emphasis added on how the Assessment should "demonstrate how significant adverse impacts of noise and vibration on health and quality of life as a result of new development will be avoided" – which is supported.	Noted.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	63	MM/PS/ Q3n	Environment and Utilities		EU6 d)	6.66	Reference to using a Site Waste Management Plan in bullet point (d) of the Policy deleted but a reference has been added to the Supporting Text in Para 6.67. As for earlier comments, do not fully understand the value of removing requirements from the Policy text and putting it into Supporting Text only. If you want a developer to do something In order to ensure the effectiveness of the Plan LBHF request that such requirements are set out in policy. In order to ensure the effectiveness of the Plan LBHF request that such requirements are set out in policy.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	64	MM2/PS/ Q3o & MM17/PS/Q3e	Environment and Utilities		EU7	6.90	Para 6.91 of the Supporting Text still states "Major proposals will be expected to demonstrate through submission of a circular and sharing economy statement within Sustainability Statements how the principles of the circular and sharing economy have been incorporated...", despite the deletion of this requirement from Policy EU7. The changes to para 6.91 weaken effectiveness of the plan. The proposed wording implies that developers are being given a choice whether to abide by the requirements of the policy and its supporting text, when previously the wording was effectively a requirement, thus strengthening the effectiveness of the policy. The Table of Modifications states that the reason given for some of these changes is "To amend wording in supporting text which could be considered as policy", however, there are numerous places where policy requirements are being deleted and inserted into the Supporting Text elsewhere.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan. The introductory wording to para 6.91 has not been amended and therefore requirements have not been weakened.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	65	MINOR/PS/ Q19	Environment and Utilities		EU8	6.95	Para 6.96 i): LBHF reject the proposed modification to point i). The modification appears to be weakening guidance on use of ISO14001 certified materials with no real justification for the modification provided.	No change proposed. The proposed modifications are required to respond to the Inspector's Q19 to remove policy guidance within supporting text. The requirement for proposals to use sustainable materials continues to be set out in EU8. Proposed modifications to paragraph 6.95 provide supporting information to inform the policy's implementation.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	66	MM2/PS/Q3p	Environment and Utilities		EU9		Former Policy EU9 iv) & vi): This point on carrying out post construction audits to demonstrate carbon emissions have been reduced as required has been deleted, as has the text on submitting an energy statement to demonstrate compliance with this policy. The latter requirement for the submission of an energy statement has been inserted into the supporting text at Para 6.98, however it is considered that by removing this requirement from policy EU9, the policy has been rendered less effective. This modification lacks justification and thus should be rejected. Reinstatement of Former Policy EU9 iv) and vi), and relevant supporting text.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	67	MM2/PS/Q3d	Environment and Utilities		EU10 f)		Policy EU10 f): The Plan should include reference the GLA's "District Heating Manual for London". Suggested change: ... the policies of this plan <u>and the Mayor's District Heating Manual for London.</u> (As footnote, link to District Heating Manual for London - https://www.london.gov.uk/sites/default/files/osd12_dh_manual_for_london_february_2013_v1-0.pdf)	No change proposed. The proposed modifications did not amend this part of the Local Plan.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	68	MM2/PS/Q3q	Environment and Utilities		EU13		Policy EU13: The requirement to carry out a Preliminary Risk Assessment prior to permission being granted has been removed but a reference has been added in the Supporting Text at Para 6.134. The justification for this modification is to ensure the effectiveness of the plan, however as stated elsewhere in our response, LBHF not see the benefit of moving requirements out of the Policy and into Supporting Text. We are unclear as to how such an approach helps in delivering the objectives of the Plan. The modification as proposed therefore lacks justification and should be rejected.	No change proposed. The transfer of the policy to supporting text was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	69	MINOR/ 2/T1/4	Transport		T1		This modification is supported, however LBHF consider that this modification should be listed as a major modification, rather than minor.	No change proposed. OPDC considers its identification as a minor modification is appropriate.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	70	MINOR/PS/ Q21	Transport		T3	7.25	Reference to the London Cycle Design Standards is welcomed. LBHF request that a footnote is added here to link to the standards to make the plan more accessible and effective.	Change proposed. The link to the London Cycle Design Standards is proposed to be provided for ease of reference.	Y	66/70

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	71	MM/PS2/OPDC/T4/1	Transport		T4		The modification is supported.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	72	MM/PS/OPDC M9(1)	Housing		H2		Policy H2: We believe that the policy should include additional wording to ensure that, for affordable housing, the host borough should have 100% nomination rights to units within their boundaries to ensure the most effective use of affordable housing. New Paragraph J): <u>j) Host Borough's will have 100% nomination rights to affordable housing units within their boundaries.</u>	No change proposed. Affordable housing nomination rights are not an issue for the Local Plan. A Nominations Policy has been approved by OPDC's Board and was endorsed at the time by the Leaders of the three host boroughs.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	73	MM/PS/OPDC M9(6)	Housing		H2		New paragraphs 8.24 and 8.25 are supported. However, we consider that review of this approach 'earliest opportunity' is insufficient, and that the OPDC should commit to a timeframe for review in order to maximise the delivery of affordable housing in the plan period. Given the timeframe for housing delivery detailed in Table 8.1, we consider that this review should take place within 5 years of adoption of the plan. Change requested: <u>Following adoption of the Local Plan, OPDC will also revisit this policy and its associated viability evidence at the earliest opportunity within five years of adoption of the Plan</u> to ensure that any increased development value...	No change proposed. Government requires that Local Plans are reviewed within 5 years of adoption. At this point OPDC will review the evidence on affordable housing needs and viability of delivery.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	74	MINOR/2/H2/11	Housing		H2	8.28	Para 8.28: We welcome instruction that applicants should work with host boroughs specifically to ensure the delivery of affordable housing.	Noted.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	75	MINOR/ 2/E1/1	Employment		E1	9.9	Para 9.9 We consider that the word 'feasible' used in this change, and in the following paragraphs is not sufficiently detailed to explain the considerations which should be taken into account. Suggested change: Wherever feasible, s Sites should deliver high plot ratios through industrial intensification <u>where feasible taking into account: impacts on the transport network , use of appropriate design to minimise conflict with non-industrial uses and avoid compromising the continued efficient function, access, service arrangements of existing industrial and related activities on-site or in adjoining areas; impact on the public realm, visual impact, vibration and noise, air quality and pollution.</u>	No change proposed. Policy E1 would be assessed in conjunction with other policies in the OPDC Local Plan, 2021 London Plan and national policy. Policies related to design, the environment, including vibration, noise, air pollution and transport are set out in chapters 5, 6 and 7 respectively, and therefore would be assessed.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	76	MINOR/PS/OPDC M16 (2)	Employment		E2	9.19	Para 9.19 Use of the OPDC's CPO powers is supported.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	77	MINOR/ 2/E3/5	Employment		E2	9.25	Para 9.25: The changes are supported, however for clarity, we consider that the new sentence should be followed by new text to clarify the considerations referred to. We also consider that it is good practice to encourage early discussion on the type of or alternative to affordable workspace provision and how it will be secured. Suggested change: OPDC will consider ... on a site by site basis. <u>Considerations will take account of viability and will include discounted market rents, the provision of flexible accommodation in a range of sizes, suitable fit-out, and flexible lease terms . Provision will be secured via a workspace management plan, and early discussions at pre-application stage will be strongly encouraged.</u>	No change proposed. Policy E3 seeks to secure an appropriate quantum of a different types of workspace to support small and start up businesses, this includes affordable workspace offered at below market rate, shared workspace and small units. The most appropriate type or nature of provision would be considered on a site by site basis, and secured by legal agreement. The level of fit out and viability, alongside other issues, can be looked at when assessing whether the type of nature of provision was appropriate. OPDC is also working on the Planning Obligations Supplementary Planning Document (SPD) which will include more detail on affordable workspace.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	78	M/PS2/OPDC/E3/1	Employment		E3	9.25	Para 9.25 We consider that these changes, whilst supported in principle, could also benefit from further clarification. It is not clear whether the reference is to grow-on space for SMEs and start up expansions, and/or relocation of businesses requiring affordable workspace. This change could also benefit from setting out the of considerations to be taken into account and cross reference to policy E5 .le Add explanatory text following to follow this proposed change such as: <u>Applicants should demonstrate how alternatives to on-site provision have been considered such as subsidised desks. Consideration of the benefits of the overall offer will be taken, taking into account the contribution to priority employment sectors, and how far it maximises social value and local employment and skills benefits as set out in Policy E5</u>	No change proposed. The policy seeks to support small and start up businesses including new businesses and, where appropriate, to support the retention of existing businesses (supported by policy E2). The type of provision will be assessed on a site by site basis and may include a range of different options which may change over time, so this level of detail is not included in the Local Plan. This policy would also be read in conjunction with policies E1, E2 and E5 which refer to providing flexibility for identified future employment growth sectors and local training, employment and economic opportunities. OPDC is also working on the Planning Obligations Supplementary Planning Document (SPD) which will include more detail on affordable workspace.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	79	MM6/PS/Q3u	Employment		E5		<p>Policy E5: Local Access to Training, Employment and Economic Opportunities: This policy is supported. we suggest that the wording could be strengthened to maximise local opportunity, tackle deprivation, inequalities opportunity and maximise social value. Criterion b: include reference to maximising social value. such as specifically targeting adjoining areas in H&F with high levels of social deprivation, and proximity to the strategic regeneration area of White City East.</p> <p>Include a new criterion to require an education and skills masterplan specifically aimed at maximising local opportunity and social value. Include in the policy wording reference to emphasise social value; ie outreach programmes to local school and colleges in Hammersmith and Fulham and a commitment to work with Hammersmith and Fulham's Economic Development office to maximise social value.</p>	No change proposed. The level of detail in policy E5 is considered appropriate and should be read in conjunction with the supporting text which provides more information and clarity on the intended implementation of the policy. The Spatial Vision and Policy SP2 (Good Growth) refer to the need to deliver benefits for local communities which supports social value objectives. This is expressed through a number of the planning policies, E5 being one of these. Paragraphs 9.34, 9.38 and 9.39 refers to partnership working with stakeholders, including the boroughs.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	80		Employment		EU5	9.33	<p>Para OPDC's Socio Economic Baseline Study (2016) – policy text could signal a commitment to review of the evidence. As the evidence underpinning social value is outdated, a reference to any planned update would benefit future negotiations and decision -making</p>	No change proposed. The Socio Economic Baseline reflects the data available at that point in time. Local Labour, Skills and Employment Strategy and Management Plans (LLSESMP) should be developed in partnership with relevant stakeholders and must be subject to approval by OPDC. This approach will ensure the most up to date evidence is used to inform these. A future review of the Local Plan would re-look at this evidence and see if it requires updating.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	81	MM6/PS/Q3u	Employment		EU5		<p>Policy E5: The changes are supported, However we consider that the revised policy could be improved by reference addressing inequalities/ social values rather than just referring to these considerations in the supporting text. Include an additional policy criterion to proactively seek to address social value, local areas of deprivation the long-term unemployed and other under-represented groups such as women, BAME groups disabled people., the long-term unemployed and ex- service personnel.</p>	No change proposed. The level of detail in policy E5 is considered appropriate and should be read in conjunction with the supporting text which provides information more detail and clarity on the intended implementation of the policy. The Spatial Vision and Policy SP2 (Good Growth) refer to the need to deliver benefits for local communities which supports social value objectives. This is expressed through a number of the planning policies, E5 being one of these.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	82		Strategic Policies		SP7		<p>Policy SP7: LBHF supports the principle of minor amendments to reflect use classes order within this policy including criterion (g). The policy could be strengthened to refer to appropriate use of conditions to control the uses within new use classes E F and Sui Generis uses and to control permitted development and phasing particularly in regards to proper place making for meeting the needs of new communities and improving the public realm. Refer to appropriate use of conditions to control the uses within each use class, permitted development rights and phasing.</p> <p>For clarification and consistency, it is suggested that the plan replicates the London Plan Explanatory Note: Applying the Use Class (Dec 2020): https://www.london.gov.uk/sites/default/files/plp_2020_statement_on_use_class_order.pdf</p>	No change proposed. OPDC considers that the proposed modifications undertaken to clarify the implementation of the updated Use Classes Order is sufficient.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	83	MM/PS2/OPDC/TCC1/1	Town Centre and Community Uses		TCC1 e)		Policy TCC1 criterion (e) This change is supported, however we consider there should be a reference to addressing shopping deficiency areas (food shopping) within walking distance of home) within and in adjoining areas. This is an important element of sustainable development. Suggested change: e) be delivered in phases, in accordance with demand created by the delivery of homes and jobs, addressing shopping deficiency areas as a priority.	No change proposed. OPDC consider that the existing provisions of Policy TCC1 provide sufficient support for necessary walk to food shopping retail uses outside of designated town centres where appropriate. This includes support for such uses within locations identified as clusters in relevant place policies, or in other locations where the sequential approach to site identification has been applied in accordance with the NPPF sequential test.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	84	MM/PS2/OPDC/TCC1/1	Town Centre and Community Uses		TCC1	10.9	Para 10.9 This change is supported, however we consider there should be a reference to addressing shopping deficiency areas (food shopping) within walking distance of home) within and in adjoining areas. This is an important element of sustainable development. Add new text: ...of homes and jobs . Provision of small-scale food shopping should be brought forward and secured by planning conditions within or adjacent to shopping deficiency areas..... It is recognised that	No change proposed. OPDC consider that the existing provisions of Policy TCC1 provide sufficient support for necessary walk to food shopping retail uses outside of designated town centres where appropriate. This includes support for such uses within locations identified as clusters in relevant place policies, or in other locations where the sequential approach to site identification has been applied in accordance with the NPPF sequential test.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	85	MM/PS2/OPDC/TCC2/1	Town Centre and Community Uses		TCC2	10.16	Para 10.16 This new section is supported, It is considered that reference should also be made to supporting meanwhile uses and 'pop ups' in vacant units can contribute to both the vibrancy of an area, and to affordable and local start-up businesses. Add Meanwhile uses and 'pop ups' in vacant units contribute to both the vibrancy of an area, and to affordable and local start-up businesses, and will be encouraged.	No change proposed. Policy TCC8 (Meanwhile Uses) sets out OPDC's support for meanwhile uses and value they can provide for local start up businesses.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	86	MM2/PS/Q3v	Town Centre and Community Uses		TCC2	10.17	Para 10.17 The reference to uses complementary to the public realm is welcomed, however we feel that , whilst protection of residential amenity is important and degree of flexibility is generally appropriate, the opportunity exists for proposal in these new communities to 'design out' such conflicts. For example by providing a 'buffer' of office or similar uses between food and drink uses and residential uses. It is considered appropriate here to reference to use of conditions to control the types of use for the purpose of proper placemaking. Add new explanatory text: Design-led solutions will be required to avoid conflict with residential uses The use of planning conditions to limit specific uses within use classes E and F and to restrict permitted development rights will be used where necessary to achieve place making and enhance the public realm.	No change proposed. The supporting text at para 10.17 relates to proposals for outdoor uses, and not design of spaces in which they are located. Policies within the Design Chapter, specifically Policy D1 (Public Realm) and Policy D3 (Well Design Buildings) will ensure a design led approach to town centre uses and public realm, and ensure conflicts between different uses are successfully addressed.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	87	MINOR/PS/Q5(29)	Delivery and Implementation		DI1	11.1	Definition of other relevant stakeholders would be welcomed, as well as specifics as to what mechanisms would be used to achieve points a and b. A firm definition of stakeholders in the supporting text.	No change proposed. The proposed modifications did not amend this part of the Local Plan. OPDC considers the Local Plan is effective.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	88		Delivery and Implementation		General comment		Further details required over what engagement has been undertaken so far with local council and what stakeholders have been consulted so far. Specification over whether stakeholders are statutory or non-statutory would also be welcomed.	No change proposed. Infrastructure stakeholder information is provided within the Infrastructure Delivery Plan. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs. A Duty to Cooperate Statement was submitted alongside the Submission Local Plan to the Planning Inspector. Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, as requested by OPDC's Planning Inspector.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	89		Delivery and Implementation		General comment		<p>Chapter 11 fails to give substantial details on how funding gaps would be resolved. While several mechanisms for future funding have been identified (in the form of Section 106 agreements, government funding and external grants), very little detail has been provided over whether these funds have been secured, how much they are worth and where specifically they will be spent. More justification and details are needed. The amount mentioned is stated by OPDC that the funding gap will be met by S106 agreements, government funding and external grants. However, there is no mention of what engagement has been undertaken, what sort of funding and what planning applications will yield these funds. More justification is needed.</p>	<p>No change proposed.</p> <p>The Infrastructure Delivery Plan (IDP) identifies a total unfunded infrastructure cost of just under £350 million, which will need to fund through planning contributions or other funding sources. This figure has been derived from detailed assessments of infrastructure costs. When estimated planning contributions are taken into account, OPDC estimates that this results in an overall funding gap of between £136 million and £202 million. The estimates of planning contributions are based on potential S106 contributions from future schemes, based on the amount secured from schemes to date, vs potential planning contributions secured through Community Infrastructure levy.</p> <p>It is common for a Local Plan to have a funding gap, and it is even more common for there to be a funding gap for a regeneration project as large and complex as Old Oak and Park Royal. OPDC's IDP sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p> <p>The IDP sets out a range of potential public funding sources which could be utilised to help address the funding gap, including the National Home Building Fund. OPDC is not relying solely on the NHBF to address the funding gap, however, there is clear government support for potentially using the NHBF to support infrastructure delivery in the OPDC area. Robert Jendrick's ministerial statement on housing needs in December 2020 stated "In order to support London to deliver the right homes in the right places, the government and Homes England are working with the Greater London Authority to boost delivery through the Home Building Fund. Homes England has been providing expertise and experience to support the development of key sites in London. Sites like Old Oak Common, Nine Elms and Inner East London provide opportunities to deliver homes on significant brownfield sites." The letter provided from Homes England appended to the IDP demonstrates the support that there is for the regeneration project and recognises the need for public investment. It is notes that Homes England would welcome a bid from OPDC.</p> <p>Matters such as the price at which land will likely be acquired and the impact of housing grant has been modelled within OPDC's Strategic Sites Viability Assessment, which shows that the key sites that have been modelled within the Local Plan can be viably developed during the Local Plan period.</p>	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	90	MM/PS2/OPDC/DI/2	Delivery and Implementation		DI1	11.8	<p>Greater clarity is required over the use of the terms “not committed” and “partly funded”, giving specific values. There is also mention of a sizeable portion of infrastructure that does not have a source of funding. Timescales for attaining funds for projects which are considered by the plan to be desirable rather than essential. Much of this infrastructure is already funded, some of this infrastructure is not required within the plan period and some is considered desirable, but not essential to delivering the homes, jobs and place-making ambitions within this Local Plan. More clarity is needed over the details of what “partly funded” means and by how much, as well as projects which are considered “not committed”. What funding has been achieved, what has been secured and how much will be sufficient for the proposed development. Regarding appendix B full infrastructure schedule of the proposed modification, a list of projects is stated on a table however, under the heading “status” many of these have indicated that the funding has not been committed. More clarity is required as this is crucial information.</p>	<p>No change proposed. Unless a project is either being delivered or has funding secured through an implemented S106 agreement, or has a commitment of funding/delivery from some other source, then it is considered "not committed" for the purposes of the IDP. Just because a project is considered not-committed, does not mean that it is un-deliverable. Such projects are likely to be delivered/funded from planning obligations from deliverable development sites identified in the Development Capacity Study (DCS), or through other funding sources which have been identified in the IDP. "Part committed" projects are those that benefit from partial funding and where additional funding sources are required to be secured.</p> <p>The Infrastructure Delivery Plan (IDP) identifies a total unfunded infrastructure cost of just under £350 million, which will need to fund through planning contributions or other funding sources. This figure has been derived from detailed assessments of infrastructure costs. When estimated planning contributions are taken into account, OPDC estimates that this results in an overall funding gap of between £136 million and £202 million.</p> <p>It is common for a Local Plan to have a funding gap, and it is even more common for there to be a funding gap for a regeneration project as large and complex as Old Oak and Park Royal. OPDC's IDP sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p> <p>The IDP sets out a range of potential public funding sources which could be utilised to help address the funding gap, including the National Home Building Fund. OPDC is not relying solely on the NHBF to address the funding gap, however, there is clear government support for potentially using the NHBF to support infrastructure delivery in the OPDC area. Robert Jendrick's ministerial statement on housing needs in December 2020 stated "In order to support London to deliver the right homes in the right places, the government and Homes England are working with the Greater London Authority to boost delivery through the Home Building Fund. Homes England has been providing expertise and experience to support the development of key sites in London. Sites like Old Oak Common, Nine Elms and Inner East London provide opportunities to deliver homes on significant brownfield sites." The letter provided from Homes England appended to the IDP demonstrates the support that there is for the regeneration project and recognises the need for public investment. It is notes that Homes England would welcome a bid from OPDC.</p> <p>Matters such as the price at which land will likely be acquired and the impact of housing grant has been modelled within OPDC's Strategic Sites Viability Assessment, which shows that the key sites that have been modelled within the Local Plan can be viably developed during the Local Plan period.</p> <p>The Local Plan is set to be delivered over a 20 year period, and it is recognised that delivery will be subject to a number of economic cycles within this period.</p>	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	91	MINOR/PS2/OPDC/D1/2	Delivery and Implementation		DI2	11.20	Paragraph 11.20 has been altered in the Inspector's comments to reflect any potential delay to HS2, but should similar delays happen again further clarity regarding contingency plans would be welcomed. This would allow for greater flexibility and scope for manoeuvre should HS2 be delayed further.	Noted.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	92	MM/PS2/OPDC/DI2/2	Delivery and Implementation		DI2	Table 11.1	<p>Table 11.1: Opportunities and Challenges for Delivery within the OPDC Places lacks clarity about exactly what challenges the site may face in terms of development. Further clarity on how communications between stakeholders (such as relevant LPAs) would also be welcomed to ensure consistencies between local plans. There is no mention of details for phasing of development, meaning the delivery mechanism of infrastructure.</p> <p>Phasing</p> <p>A. Quantum of development</p> <p>i. Residential – market housing, affordable housing or DMS (discounted market sales), DMR (discounted market rented)ii. Industrial – clarity is needed for new Class E development including different Class A1, A2, A3, A4 and A5 in the old Use Classes Order; Class B1 (offices) etc.</p> <p>B. Timescale - Yearly delivery by provision e.g., 18 months, 24 months, 36 months etc. More detail is needed on these timescales.</p> <p>C. Monetary - In terms of S106 financial contribution details of time period and payment are required.</p> <p>D. Viability mechanism</p> <p>i. Calculation of viability model i.e., how to calculate the viability differences between the delivery of affordable housing in relation to the market housing.</p> <p>ii. Viability Review Mechanism – calculation of how the land value affects the calculation of affordable housing according to the Review Mechanism timescale, such as 18 months or two years.</p>	<p>No change proposed. OPDC considers the proposed modifications are effective and justified. OPDC considers table 11.1 is sufficiently clear in defining opportunities and challenges appropriate for the role and function of a Local Plan.</p> <p>Communication methods between stakeholders will vary dependent on the opportunities and challenges needing to be considered. An example is the regular OPDC Duty to Cooperate Meetings and Tri-Borough meetings held with the boroughs.</p> <p>Phasing of development is set out in the Development Capacity Study (DCS) Update and reflected in table 3.1 and figure 3.16. Phasing of infrastructure is set out in the Infrastructure Delivery Plan and relevant Local Plan policies such as policy TCC3.</p> <p>Development capacity of each Local Plan place is provided in table 11.1. Capacity and phasing of each site is set out in the DCS Update. The DCS Update methodology and phasing information accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Affordable housing requirements are set out in policy SP4 and H2.</p> <p>Policies for managing employment uses are set out SP5 and E1 to E5.</p> <p>As set out in Policy H2, all residential developments with the capacity to provide more than 10 self-contained units will be required to provide affordable housing, subject to viability, and applying the threshold and viability approach as set out in the most up-to-date Mayoral policy and/or guidance. This is currently the 2021 London Plan and deals with how viability is assessed and the required review mechanisms. It is not considered necessary to repeat London Plan policy in the Local Plan.</p> <p>OPDC's Whole Plan Viability Study and Strategic Sites Viability Assessment demonstrate that development is viable across the OPDC area. Further consideration of planning contributions will be undertaken during the development management process. Any proposal will need to accord with relevant policies and material considerations.</p>	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	93	MM/PS2/OPDC/DI2/2	Delivery and Implementation		DI2	Table 11.1	Table 11.1 does not provide specific details over funding for many of the projects. This includes source of funding as well as the figures involved. Clarification is required on what work has been achieved so far.	No change proposed. OPDC considers the proposed modifications are effective and justified. The infrastructure Delivery Plan (IDP) identifies timelines for delivery of all infrastructure projects. These timelines have been informed by timelines for development sites, as evidenced by the Development Capacity Study, which will either deliver, contribute towards or will need to be unlocked by these projects. Sources of funding are also set out. Policy DI2 (Timely Delivery and Optimised Phasing) clarifies that OPDC will look to secure the timely delivery of infrastructure required to support the needs of development.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	94		Delivery and Implementation		General comment		There is an ongoing feasibility study for a new rail link between Brent Cross and Hounslow via Old Oak. However, chapter 11 of the OPDC Local Plan makes no mention of the West London Orbital Line which could unlock significant growth in the area (London Plan, 2021). If this project were to get the green light, it could have implications for the phasing of development in the area. Mention this project and discuss its potential implications on phasing development in OPDC.	No change proposed. Table 11.1 refers to the West London Orbital line alongside policies P7 and P7C2.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	95		Delivery and Implementation		General comment		Similarly, chapter 11 makes no reference to the proposed Old Oak Common Lane Station (or Hythe Road) which could also have implications for the phasing of development in the area. Mention this project and discuss its potential implications on phasing development in OPDC.	No change proposed. Table 11.1 refers to the proposed Old Oak Common Lane Station alongside policies P7 and P7C2. Hythe Road is no longer proposed given the change in land use approach in Old Oak North and the removal of this station has been supported by TFL through their Statement of Common Ground. https://www.london.gov.uk/sites/default/files/appendix_s_-_opdc_schedule_of_statements_of_common_ground_0.pdf	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	96		Delivery and Implementation		General comment		More detail on the stakeholders OPDC plans to work with to support the timely and successful regeneration of the area would be appreciated as well as the mechanisms to do achieve this. Evidence for engagement with external stakeholders is needed with agendas and minutes to be circulated. Especially, the delivery timeframes and methodology.	No change proposed. Further stakeholder information to that provided in table 11.1 is provided within the Infrastructure Delivery Plan. Phasing of development is set out in the Development Capacity Study (DCS) Update and reflected in table 3.1 and figure 3.16. Phasing of infrastructure is set out in the Infrastructure Delivery Plan and relevant Local Plan policies such as policy TCC3. Development capacity of each Local Plan place is provided in table 11.1. Capacity and phasing of each site is set out in the DCS Update. The DCS Update methodology and phasing information accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs. Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, a requested by OPDC's Planning Inspector.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	97		Delivery and Implementation		DI3	11.31	The supporting text mentions bi-weekly meetings with LBHF amongst other Boroughs. Evidence on whether this has been effective would be helpful, as well as details on what improvements can be made.	No change proposed. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs. A Duty to Cooperate Statement was submitted alongside the Submission Local Plan to the Planning Inspector. Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, a requested by OPDC's Planning Inspector.	N	

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66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	98	MM2/PS/Q3d	Delivery and Implementation		DI3	11.51	More clarity required on how the OPDC will promote and implement Compulsory Purchase Orders (CPO). Is CPO the first choice for acquiring land? If not please add detail on the protocol and process before CPO is required. Add detail on CPO protocol and process including timeline leading up to resolution to pursue a CPO or a negotiation with the landowner.	No change proposed. The proposed modifications did not amend this part of the Local Plan. OPDC considers the Local Plan is effective and it not appropriate to repeat detailed CPO procedures within a Local Plan.	N	
66	Local Authority	David	Gawthorpe	London Borough of Hammersmith and Fulham	99		Infrastructure Delivery Plan			Tables 4.1, 4.2, 4.3, 4.4 4.5, 4.6	Various tables within the IDP for bus and rail infrastructure, road infrastructure, pedestrian and cycle connections, utilities projects, green infrastructure/open space and social infrastructure state that funding is "not committed". If the funding is not committed, how can it be ensured that it is deliverable? More detail is required on where, how and when this funding will come forward. Additionally, has this been affected by the COVID-19 pandemic and what adjustments (if any) have been made to factor in the economic downturn.	No change proposed. Unless a project is either being delivered or has funding secured through an implemented S106 agreement, or has a commitment of funding/delivery from some other source, then it is considered "not committed" for the purposes of the IDP. Just because a project is considered not-committed, does not mean that it is un-deliverable. Such projects are likely to be delivered/funded from planning obligations from deliverable development sites identified in the Development Capacity Study (DCS), or through other funding sources which have been identified in the IDP. it is unsurprising that funding for the majority of projects is not committed as this IDP has been developed at the start of a 20 year planning period. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	
67	Land owner	James	Guthrie	London Green	1		General	General			Please find enclosed representations to the Old Oak and Park Royal Development Corporation (OPDC) Post Submission Modified Draft Local Plan (May 2021) on behalf of London Green, providing in principle support to this consultation, subject to a number of minor comments. Background London Green is a property development and investment firm, established in 1998 with a strong track record in the residential market, delivering high quality schemes across London. Their experience spans residential-led mixed-use schemes, build to rent developments as well as converting commercial properties to residential. In Spring 2021, London Green (via one of its development companies) purchased the Mitre Wharf site within the OPDC area, with the intention of delivering a high-quality residential-led development.	Noted.	N	

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67	Land owner	James	Guthrie	London Green	2		Places		P10		<p>Response to the Local Plan Main Modifications</p> <p>The Mitre Wharf site (ref. 31) is identified in the Post Submission Modified Draft OPDC Local Plan 2021 ('Draft OPDC LP') at Table 3.1 (Site Allocations) for 100 housing units in the first 10 years of the plan period, and a minimum of 420 sq m of commercial or industrial floorspace (comprising residential use above ground and lower ground floor commercial uses).</p> <p>London Green fully support the allocation and propose to adhere to the principles of the Draft OPDC LP, however modern construction techniques and a detailed assessment of the site denotes more units can be delivered on the site, while adhering to the massing principles enshrined in the Draft OPDC LP evidence base (see for example p.44 of the Scrubs Lane Development Framework Principles Update 2021). This approach would be in accordance with London Plan 2021 Policies:</p> <ul style="list-style-type: none"> ▪ GG2 – “promoting higher density development, particularly in locations that are well-connected”. ▪ H1 – “optimise the potential for housing delivery on all suitable and available sites [...] especially [...] sites with existing or planning PTAL 3-6”. 	No change proposed. Table 3.1 identifies that site allocation housing capacities are minimums. Should a proposal seek to increase the housing capacity, this will be determined using relevant development plan policies and material considerations.	N	
67	Land owner	James	Guthrie	London Green	3		Places		P10		The work undertaken to date by London Green suggests the delivery of a minimum of 140 units is realistic and appropriate at the Mitre Wharf site.	Noted.	N	
67	Land owner	James	Guthrie	London Green	4		Places		P10		<p>Additionally, the Draft OPDC LP Policy P3 (Grand Union Canal) seeks to deliver “heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for tall buildings at key crossing points such as Channel Gate Street, Old Oak Lane and Scrubs Lane”. This is also replicated within Draft OPDC LP Policy P10 (Scrubs Lane).</p> <p>London Green and Quod support the general thrust of this policy however recommend the wording is clarified via the suggested amendment in green below, to clearly support increased heights at the Scrubs Lane bridge / junction (i.e. to the east of the Mitre Wharf site):</p> <p>“heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for increased height and tall buildings at key crossing points such as Channel Gate Street, Old Oak Lane and Scrubs Lane”</p>	No change proposed. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. This element of policy P3 remains unchanged from the submission Local Plan.	N	
67	Land owner	James	Guthrie	London Green	5		Places		P10		<p>Summary</p> <p>This consultation provides an important and unique opportunity to ensure the OPDC's Local Plan is fully aligned with London Green's ambition for Mitre Wharf and to ensure its potential to increase London and the OPDC's housing supply, and deliver and high-quality development is fully realised.</p> <p>To summarise, the OPDC Local Plan Main Modifications (May 2021) are supported in principle, however we request that the comments set out within this representation are respectfully considered.</p>	Noted. Please refer to OPDC's responses to London Green's detailed comments.	N	

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68	Land owner	Andrew	Lightstone	Lords Builders Merchants	1		Places		P9		<p>Further to our recent correspondence and on behalf of our client Lords Builders Merchants, located within the Radford Industrial Estate on Goodhall Street, London, NW10 6UA ('the Site'), we are pleased to enclose our formal representations to the Post Submission Modified Draft Local Plan ('PMDLP')</p> <p>Background</p> <p>The Site is located to the eastern end of the Channel Gate Development Area ('CGDA'). The PMDLP (Policy P9 and the associated Channel Gate Development Framework Principles document [February 2021] in particular) currently being consulted on set out a list of design parameters for the redevelopment of the CGDA that are fairly prescriptive. Whilst it is felt the majority of such parameters can be met successfully and in a way that maximises the Site's potential; the height limitations prescribed would not allow for a sufficient quantum of development necessary to both balance the viability constraints associated with future redevelopment; and to deliver the wider more strategic benefits contained within the PMDLP.</p> <p>This submission pack therefore suggests minor changes be made to Section 7 of the Channel Gate Development Framework Principles document ('CGDF') in order to allow for a minor extension of the area currently designated as being appropriate for tall buildings. This suggested change is supported by the following documents, whose purposes are set out in more detail below:</p> <ul style="list-style-type: none"> • Viability Particulars; • Architectural Study; and • Planning Note. 	Noted.	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	2		Places		P9		<p>Viability Particulars</p> <p>DS2 were appointed to test the viability of a number of different scheme scenarios for the Site. This includes a 'policy compliant' scheme that is in line with what current PMDLP Policy allows - comprising approximately 320 units and up to 15 storeys; plus larger options of 400 and 450 units respectively (the latter of which was presented to the OPDC on 21/06/21). In preparing this viability testing exercise DS2 have sought to align assumptions to the OPDC's own Whole Plan Viability Study.</p> <p>There is however a significant difference in the assessment of an Existing Use Value. The Whole Plan Study was prepared in 2017, since which there has been massive growth in industrial values in prime locations such as Park Royal. In addition, the Site is occupied by a profitable business which, to relocate would incur major expenditure in part due to the prohibitive cost of remaining in Park Royal.</p> <p>On a current day basis none of the scheme options are considered viable. DS2 have however considered the regeneration of the Old Oak Common/ Park Royal area over the delivery period and as such have undertaken extensive sensitivity testing of the scheme options, as well as considered variations in affordable housing tenure and quantum. The results of this testing are set out in the table below, which concludes that in order to provide an overall affordable quantum of 35% and maximise the chances of delivering a viable scheme, and in turn ensuring that the Local Plan in respect of the Channel Gate area is sound and deliverable, a scheme of between 450 units (70% rent, 30% intermediate) and 400 units (30% rent, 70% intermediate OR 100% intermediate) is required on the Site. More information about these scenarios is included within the enclosed Viability Particulars.</p> <p>As above, dependent on mix and tenure a viable scheme should comprise a minimum of 400 residential units. As set out in more detail in the enclosed Architectural Study however, the height caps currently proposed on the north-west portion of the Site do not currently allow for this capacity.</p>	<p>No change proposed.</p> <p>The Local Plan is supported by a Strategic Sites Viability Assessment, which has assessed the viability of the overall Channel Gate Site Allocation. This assessment has found that the Channel Gate site allocation can viably be delivered in line with Local Plan Policies.</p> <p>Policy DI1 a) sets out how OPDC will balance priorities when determining proposals for new development, and consider site specific constraints. The 3,100 target for Channel Gate is a minimum target and could be exceeded, subject to other relevant planning policies being satisfied.</p>	N	

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68	Land owner	Andrew	Lightstone	Lords Builders Merchants	3		Places		P9		<p>Architectural Study</p> <p>In tandem with the Viability Particulars, Fourfoursixsix Architects have worked to compile modelling scenarios to ascertain (i) the residential capacity of a policy compliant scheme across the Site (320 Dovetailing with the Viability Particulars, the Architectural Study demonstrates that in order for the viably optimum 400 residential units to be accommodated on Site, the height cap to the north-west would have to be increased to allow for a taller building. This area is already immediately adjacent to a zone the CGDF designates as being "Appropriate for Tall Buildings", so our suggested policy update involves a minor extension to this designation.</p> <p>The Architectural Study goes on to explore the impacts the extension of this designation will have on surrounding sensitive assets – most notably the adjacent Old Oak Lane Conservation Area. The suggested area of height and respective massing wireline have been modelled within views from the conservation area with the results demonstrating that, by virtue of the orientation of the existing streets and houses, the taller massing would be read only in the periphery of the view and not on the central on axis. Moreover, the new height would be read alongside the emerging context which comprises other sites already identified by the OPDC as being appropriate for height. This suggests the OPDC have already envisaged significant visual change in this view, whereby high-quality architecture would be an enhancement to the setting of the conservation area.</p>	<p>No change proposed.</p> <p>Policy P9, as evidenced by the Channel Gate Development Framework Principles, provides general height guidance for the parts of the site that are adjacent to sensitive locations.</p> <p>The area directly south of the railway cottages and north of the Grand Union Canal is recognised as being particularly sensitive due to its setting between two conservation areas. As well as the need for general height guidance, the Local Plan does not identify this location as being appropriate in principle for tall buildings, given its proximity to two conservation areas.</p>	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	4		Places		P9		<p>Planning Note</p> <p>Prepared by DP9, this explores the more granular wording of the PMDLP Policy and CGDF, bringing together the conclusions of the viability and architectural studies to set out the residential capacity that policy allows; versus the residential capacity required to deliver a viable scheme. On the basis that the zone the CGDF designates as being "Appropriate for Tall Buildings" is conceptual and flexible rather than fixed, then we would appreciate a clarification. If this is not the case however, the Planning Note concludes by setting out the changes we are requesting as part of this Consultation, and the subsequent appropriateness of these changes. In this respect reference is also made to the recently adopted London Plan 2021's attitude to tall buildings which requires Planning Authorities to approve applications for tall buildings only in those areas specifically identified for such – rather than maintaining the flexibility for such applications to be determined on a case-by-case basis.</p> <p>We hope everything set out above and enclosed is clear and we would be open to further discussions to advance the minor amendment to the CGDF. In the meantime, if you do have any further questions or queries please do let us know.</p>	<p>No change proposed.</p> <p>The area directly south of the railway cottages and north of the Grand Union Canal is recognised as being particularly sensitive due to its setting between two conservation areas. As well as the need for general height guidance, the Local Plan does not identify this location as being appropriate in principle for tall buildings, given its proximity to two conservation areas.</p> <p>Policy D11 a) sets out how OPDC will balance priorities when determining proposals for new development and consider site specific constraints.</p>	N	

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68	Land owner	Andrew	Lightstone	Lords Builders Merchants	5		Places		P9		<p>This Planning Note is written on behalf of our client, Lords Builders Merchants, located within the Radford Industrial Estate on Goodhall Street, London, NW10 6UA ('the Site'), within the area the OPDC Post Submission Modified Draft Local Plan ('PMDLP') designates as the Channel Gate Development Area ('CGDA'). The Site is located on the eastern end of the Channel Gate Development Area parallel to the Grand Union Canal.</p> <p>1.0 Background</p> <p>1.1 The Regulation 19 (2) OPDC Local Plan identified CGDA under its Policy P9 as an area for industrial intensification, whereby its current designation as a Strategic Industrial Location was to be retained. However, the PMDLP (Policy P9 and the associated Channel Gate Development Framework Principles document [February 2021] in particular) remove this designation in favour of the creation of a new residential-led neighbourhood. The principle of re-designation is very much supported. In light of the considered constraints surrounding the CGDA, the design parameters for its redevelopment set out in the PMDLP and its supporting documentation are fairly prescriptive. Whilst it is felt the majority of such parameters can be met successfully and in a way that maximises the Site's potential; the enclosed feasibility exercise demonstrates that the height limitations prescribed would not allow for a sufficient quantum of development necessary to both balance the viability constraints associated with future redevelopment; and to deliver the wider benefits contained within the PMDLP. It is therefore suggested in this note that some minor changes be made to the PMDLP's supporting documentation.</p> <p>Accordingly, this Planning Note first presents the current PMDLP Policy position and the resulting quantum of development this would allow (Sections 2 and 3); before setting out our suggested changes to this and a subsequent assessment into the appropriateness of such changes (Sections 4 and 5).</p>	Noted. See response to detailed comments.	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	6		Places		P9		<p>2.0 Current PMDLP Policy Position</p> <p>2.1 PMDLP Policy P9 contains the design vision for the CGDA. With regards to heights, the policy and its supporting text notes these have been balanced to "optimise development capacity" whilst also responding to the adjacent sensitive locations of the Grand Union Canal Conservation Area to the south and the Old Oak Lane Conservation Area (Island Triangle) to the north.</p> <p>2.2 Relevant to the Site itself, the constraints set by policy include general heights of 6 - 10 stories fronting Victoria Road, general heights of 6-8 stories fronting the canal, and lower massing adjacent to the Island Triangle. These height parameters are reiterated in Principle 9 of the Channel Gate Development Framework Principles document ('CGDF'), which includes an additional Figure 7.1 allocating the Site for buildings of "Lower Heights Adjacent to Sensitive Locations". Beyond and adjacent to the north-western edge of the Site however, Figure 7.1 illustrates this a cluster for "Tall Buildings Appropriate in Principle".</p>	Noted.	N	

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68	Land owner	Andrew	Lightstone	Lords Builders Merchants	7		Places		P9		<p>3.0 Policy Compliant Development Quantum</p> <p>3.1 The enclosed Architectural Pack models these policy compliant heights across the Site to assess the quantum and capacity of development they would otherwise facilitate. Study 02A within this pack includes a maximum building height of 15 stories in a block to the very north-west of the Site; with three further blocks stepping down to a maximum of 9 stories towards Old Oak Lane which becomes Victoria Road at its south-western end. Each block has lower shoulder heights (9 stories adjacent to the canal and 5 storeys adjacent to Island Triangle) to provide an appropriate buffer to these sensitive locations. Such a scheme would comprise 321 residential units.</p> <p>3.2 At present the 321 units accommodated within the enclosed Capacity Study 02A comprises 35% affordable housing ('AH') made up of 100% Intermediate Tenures. Whilst the 35% AH baseline provision is in accordance with threshold approach set out in Policy H5 of the London Plan 2021 therefore, the tenures that make up this 35% are not – conflicting with PMDLP Policy H2 which otherwise requires an AH provision to comprise a minimum 30% Social Rent (or London Affordable Rent ['LAR']).</p> <p>3.3 It is our consideration therefore that the heights across the Site required by the current PMDLP Policy direction would result in a residential quantum that:</p> <ul style="list-style-type: none"> • fails to genuinely maximise the Site's potential which, at its southern point has a PTAL 4; and is only 200m from PTAL 5 and 300m from PTAL 6 – contrary to PMDLP Policy H1 and London Plan Policy H1 which requires a minimum delivery of 13,670 new homes to be delivered within OPDC within the plan period; and • as demonstrated by the enclosed viability particulars, would fall short of being able to viably deliver a policy compliant provision of affordable housing (a 35% total provision comprising a minimum of 30% Social Rent (or LAR) tenures. 	<p>No change proposed.</p> <p>Policy P9, as evidenced by the Channel Gate Development Framework Principles, provides general height guidance for the parts of the site that are adjacent to sensitive locations.</p> <p>The area directly south of the railway cottages and north of the Grand Union Canal is recognised as being particularly sensitive due to its setting between two conservation areas. As well as the need for general height guidance, the Local Plan does not identify this location as being appropriate in principle for tall buildings, given its proximity to two conservation areas.</p> <p>In optimising the development capacity of any site, it is necessary to consider the impacts of development on sensitive locations while seeking to maximise the potential of a site. OPDC consider that both Policy P9 and the Channel Gate Development Framework Principles successfully achieve this balance.</p> <p>Policy DI1 a) sets out how OPDC will balance priorities when determining proposals for new development, and consider site specific constraints.</p>	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	8		Places		P9		<p>4.0 Suggested Changes to PMDLP Policy</p> <p>4.1 As part of the enclosed viability exercise, the primary action was ascertain the form, scale and residential capacity of a scheme that would be viably capable of accommodating the affordable housing provision required by policy – whilst at the same time, being in keeping with the spirit of PMDLP Policy P9 and the CGDF. With this in mind, the enclosed Architectural Pack models Study 02B which comprises 400 residential units with a policy compliant provision of AH. Whilst primarily capacity-led rather than anything comprehensively designed, it is considered that with further refinement Study 02B would comply with many of the key the parameters of PMDLP Policy P9 – with the exception of heights in the north-west area of the Site.</p>	<p>No change proposed. The determination of whether specific design approaches are consistent with policies as set out in the Local Plan would be determined through the development management process, or potentially through more detailed planning guidance.</p>	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	9		Places		P9		<p>4.2 The PMDLP defines tall buildings as those above 15 storeys, or else a minimum of 38 metres above ground level. Study 02B includes a maximum building height of 25+ storeys in the north-west of the Site – with three further blocks stepping down to a maximum of 10 storeys towards Old Oak Lane. As required by policy, each of these blocks have lower shoulder heights fronting the adjacent sensitive locations to serve as a buffer. The three lower blocks are therefore considered to be within the remit of heights required by PMDLP Policy 9 and CGDF Principle 9. The 25+ storey block contravenes however, being located in an area that CGDA Figure 7.1 designates as for "Lower Heights" only.</p>	<p>No change proposed. The determination of whether specific design approaches are consistent with policies as set out in the Local Plan would be determined through the development management process, or potentially through more detailed planning guidance.</p>	N	

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68	Land owner	Andrew	Lightstone	Lords Builders Merchants	10		Channel Gate DFP			Figure 7.1	4.3 We appreciate that Figure 7.1 may only be conceptual at this point whereby the intention may have always been for there to be inbuilt flexibility for tall buildings in this area. In this respect, we would be grateful for a clarification. However, if this is not the case then we set out below in Table 1 suggested changes to both Figure 7.1, Principle 9, and the Supporting Text in Section 7 of the CGDF.	<p>No change proposed.</p> <p>The Local Plan does not identify this location as being appropriate in principle for tall buildings, given its proximity to two conservation areas, and its particular impact of tall buildings on the setting and character of the Old Oak Lane Conservation Area.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	11		Channel Gate DFP			Principle 9	<p>Proposals should deliver the place vision by contributing a variety of building heights across Channel Gate that respond to sensitive locations and optimise development capacity by delivering:</p> <p>a) generally, 6 to 10 storeys along Victoria Road;</p> <p>b) generally, 6 to 8 storeys fronting the Grand Union Canal;</p> <p>c) lower heights and appropriate massing adjacent to the Island Triangle;</p> <p>d) increased heights and massing adjacent to rail lines and freight activity to mitigate impact on residential amenity;</p> <p>e) tall buildings at appropriate locations throughout Channel Gate, including key junctions and spaces, where they assist with legibility and place making; and</p> <p>f) heights appropriate to support intensified / multi-storey industrial uses on the Willesden Freight Terminal; <u>and</u></p> <p>g) <u>Tall buildings that have a massing and materiality that responds to any sensitive locations.</u></p>	<p>No change proposed.</p> <p>Policy requirements for how proposals should respond to sensitive locations are set out in Strategic Policy SP9 and relevant Design policies of Chapter 5. Specific design guidance for tall buildings within the Channel Gate place is not considered necessary.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	12		Channel Gate DFP			7.2	7.2. In less sensitive locations, there is the scale and opportunity for development to deliver increased building heights. Tall buildings would be considered appropriate in principle throughout most of Channel Gate, where they assist with legibility and place making <u>and where their massing and materiality responds to any nearby sensitive locations.</u> Tall buildings may be supported at key crossings of the Grand Union Canal, subject to site specific considerations.	<p>No change proposed.</p> <p>Policy requirements for how proposals should respond to sensitive locations are set out in Strategic Policy SP9 and relevant Design policies of Chapter 5. Specific design guidance for tall buildings within the Channel Gate place is not considered necessary.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

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68	Land owner	Andrew	Lightstone	Lords Builders Merchants	13		Strategic Policies		SP9		<p>5.0 Appropriateness of Suggested Changes</p> <p>5.1 The extents of the "Tall Buildings Appropriate in Principle" designation within the PMDLP is understood to have been devised so as to preserve the sensitivity of the adjacent Old Oak Lane Conservation Area. In this respect, key to allowing for a minor extension of this designation is understanding the level of impact it may have on the significance of this Conservation Area.</p> <p>5.2 The Old Oak Lane Conservation Area is a 19th Century estate of railway workers' cottages and an associated public house. The buildings are typically two-storey terraced houses, with small gardens and narrow back alleys to the rear. Uniformly arranged, the conservation area has a rigid north-south orientation comprising a group of three parallel streets to the north of Channel Gate Road and a smaller single stretch of Goodhall Street to the south. To the rear of the wider conservation area and serving as a buffer to the wider CGDA, is a dense line of trees and vegetation.</p> <p>A more comprehensive review of this Conservation Area and its associated Appraisal and Management Plan are contained within the accompanying Architectural Study. However, in summary, whilst its low, domestic scale is recognised and appreciated, the emerging context to the north and west should be fully considered – which in accordance with the CGDF, has scope to comprise tall buildings. In this respect, a slight extension to the Tall Buildings designation when viewed cumulatively within this emerging backdrop is not considered to have any increased adverse impacts on the conservation area character. In this respect, the orientation of the streets in the conservation area and the abundance of surrounding vegetation would further mitigate the visual presence of additional tall buildings in this location.</p>	<p>No change proposed.</p> <p>The Local Plan does not identify this location as being appropriate in principle for tall buildings given its proximity to two conservation areas, and in particular the impact of tall buildings on the setting and character of the Old Oak Lane Conservation Area.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
68	Land owner	Andrew	Lightstone	Lords Builders Merchants	14		Strategic Policies		SP9		<p>In issuing our suggested changes to the CGDF which, in turn, would slightly extend the area within CGDA considered acceptable for tall buildings, we have had full consideration of the position of the London Plan 2021 and discussions had in the lead up to its adoption. In particular is Policy D9 (Tall Buildings). Prior to the adoption of this policy, there was general flexibility in where tall buildings could be located insofar as they represented exemplar design and public benefit which outweighed any pursuant harms. Adopted Policy D9 however (strengthened by the Secretary of State Direction issued to the Mayor of London on 10th December 2020) only allows tall buildings in areas specifically identified by a respective Local Planning Authority – regardless of whether or not such levels of design and benefit could be derived in other "non-identified" areas.</p> <p>With London Plan Policy D9 therefore removing any scope for flexibility with regards to tall building locations, our suggested changes to CGDF would unlock the possibility for a tall building to be located to the north west portion of the Site. This in turn (as set out in the accompanying viability particulars) would unlock the Site in its entirety for the delivery of a scheme that would conform with strategic policy; maximising the potential of the site whilst viably delivering the other benefits contained in the plan – notably affordable housing.</p>	<p>No change proposed.</p> <p>The Local Plan does not identify this location as being appropriate in principle for tall buildings given its proximity to two conservation areas, and in particular the impact of tall buildings on the setting and character of the Old Oak Lane Conservation Area.</p> <p>In optimising the development capacity of any site, it is necessary to consider the impacts of development on sensitive locations while seeking to maximise the potential of a site. OPDC consider that the tall building location successfully achieves this balance.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
69	Local Resident	Luke	McAdie		1		General	General			<p>I am writing as a young user of Wormwood Scrubs and this is my personal response to the plan.</p>	Noted.	N	

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69	Local Resident	Luke	McAdie		2		Strategic Policies		SP8		<p>1. The proposed plan does not have the interests of local residents at heart. No provision has been made for green spaces, public amenity areas and a general feeling of light and space that people need to enjoy a reasonable quality of life. The main objective appears to be maximum profit over sustainability, harmony and basic good design.</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and facilitate the development of the area. This will support the delivery of sustainable high quality development across the OPDC area and deliver benefits for Londoners and local people.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy D5 provides specific guidance for delivering appropriate levels of amenity for building users.</p>	N	

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69	Local Resident	Luke	McAdie		3		Places		P10		<p>2. The proposed development at the end of Mitre Way features buildings of overwhelming density, completely inappropriate for the area and bearing no respect whatsoever for local residents. Besides this, it seems that no one has considered how this development will affect the traffic on North Pole Road. The junction where it joins Wood Lane and Scrubs Lane is already extremely congested as well as dangerous, with vehicles accelerating up the wrong side of the road to turn right at the lights. This ill thought out plan would leave traffic at a standstill.</p>	<p>No change proposed.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can then continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects with the eastern entrance of Old Oak Common station via the Grand Union Canal, and the second that connects Old via Union Way and Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area in including providing bus access to Old Oak Common station. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	

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69	Local Resident	Luke	McAdie		4		Strategic Policies		SP8		<p>3. There is little or no consideration for providing green spaces for recreation and well being. The importance of this is now widely acknowledged and proven to improve mental and well as physical health, and yet the plan merely makes lazy references to providing 'access to nature,' and 'integrating green spaces.' This means little or nothing. What's more, Wormwood Scrubs itself must not be commandeered for this purpose. The Scrubs has already suffered during the last year due to extra footfall, and the toll on the wildlife has been great. This has been further exacerbated by HS2, which has caused significant destruction. It should be protected, not exploited by OPDC and used to tick a 'green spaces' box. Genuine new green spaces should be created.</p>	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners. A temporary planning application for an alternative construction access road for HS2 (ref 21/0001/FULOPDC) was granted planning permission by OPDC planning committee on 23 February for a period of 18 months. This requires mitigation measures to be implemented as set out in the Ecological Appraisal and Arboricultural Report.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	
69	Local Resident	Luke	McAdie		5		Design		D4		<p>4. There appears to be no harmony at all in the mass of tall buildings proposed. The area has already lost huge amounts of sky views from recent developments such as the jarring Imperial College development. The last thing that's needed is more tall buildings of random design blighting our skyline. These buildings will still be there long after we are all dead and gone and OPDC need to take the design seriously rather than focus on maximum scale and profit. It is surely time to go back to the drawing board and design something that Londoners can be proud of, that shows urban design at its best and has the needs of the community at its heart. Having lived in the area for over twenty years I dread seeing more damage done by greedy property developers with ill thought out designs such as this one.</p> <p>I reject this modified draft plan for all the reasons above.</p>	<p>No change proposed.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

70	Local Resident	M	Robinson	1	General	Consultation	<p>disagreement and concern to the OPDC's March 2021 revised Local Plan from 2018 with major changes. I would have preferred to be given (with every change made to the plan) a hard copy of a map clearly showing the new changes and clearly marking the new areas/names which are being created. I would have considered this a transparent way to engage with local residents.</p> <p>I know this can be done, as I received an A4 general letter through the post about the upcoming meetings. Clearly money plays a part in keeping the residents informed and clearly, we (as local residents) are not worth spending any money on printing information to keep us informed in a tangible way.</p> <p>I have very little faith that any concerns raised will be given any consideration, I feel that we are merely an irritant in your process, preferring to feign concern by giving reams of data online and expecting the "lay person" to access this information and to fully understand what is happening, in my opinion.</p> <p>I attended one of your online meetings on Thursday 17th June 2021 and the people holding the meeting were using names of area which I did not have a clue where they were referencing. Again, I believe this to be a deliberate covert method to "blind side" local residents to implement any changes under our noses, feigning that you are keeping residents informed when you are not.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
70	Local Resident	M	Robinson		2		Places		P7		I can see huge changes to this area, whereby the area will be all consumed with high-density, high-rise blocks with little green space for those who live in those blocks. This will have a direct impact on low-rise existing residential areas and the local Golf Links estate. I raised some of my concerns at the OPDC online event held on Thursday 17 th June 2021 using the chat facility on the web platform.	<p>No change proposed.</p> <p>OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The modified Local Plan policies P7 and P7C1 relating to North Acton continue to require high quality high density development in North Acton.</p> <p>Policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC provided verbal and written responses to the questions raised in the chat facility at the consultation events.</p>	N	
71	Land owner	Caroline	McDade	Mapletree Investments	1		Strategic Policies		SP10		The Proposed Submission Modified Draft Local Plan (PSMDLP) currently out for consultation and which these representations relate to, allocates the Site for a minimum of 300 net additional homes and a minimum of 500 sqm of commercial or industrial floorspace, equating to delivering a minimum of 40 new jobs. These representations are submitted in support of the draft allocation.	Noted.	N	

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71	Land owner	Caroline	McDade	Mapletree Investments	2		Strategic Policies		SP10		<p>Response to Main Modifications</p> <p>The PSMDLP includes the Site in Table 3.1: Site Allocations under site number 38, labelled as '1 Lakeside Drive', for residential-led development. Table 3.1 of the PSMDLP sets out that the Site will deliver a minimum of 300 net additional homes over the first ten years of the plan period, as well as delivering a minimum of 500 sqm of commercial or industrial floorspace over the plan period which will result in 40 new jobs. Mapletree is pleased to note that the Site has been considered positively by the Council and supports the draft allocation for residential-led development. Under the Government's Standard Method (published 2020), LB Brent's housing requirement has increased from the current local plan requirement of 1,525 dwellings per annum (dpa) to 3,574 dpa. This represents a substantial increase in the number of homes LB Brent will need to deliver to meet its evergrowing housing need. The Site's allocation will significantly contribute towards LB Brent's housing requirement providing a range of homes in a sustainable location. Mapletree considers that the Site is suitable and available in accordance with the requirements of the National Planning Policy Framework (NPPF, 2019) and therefore OPDC should continue to allocate the Site for residential-led development in the emerging Local Plan. At a regional level, the London Plan (adopted March 2021) sets out an indicative capacity for new homes and jobs in opportunity areas. For the Old Oak Park Royal Opportunity Area (OOPRPA) the London Plan sets out that it is expected to deliver 25,500 new homes and 65,000 new jobs over the next 20-25 years, making it one of London and the UK's largest regeneration projects. The PSMDLP sets out that 19,850 of these homes and 36,350 of these jobs can be delivered by 2038. In terms of homes, OPDC has a target of delivering 13,670 additional homes over the period from 2019 to 2029. The Site's allocation for a minimum of 300 net additional homes is key to delivering against this target as all 300 homes are to be delivered over the first ten years of the plan period. Similarly, the commercial floorspace (minimum 500 sqm) which will provide a minimum of 40 new jobs, is also expected to be delivered in the first 10 years of the plan period and therefore will contribute towards the areas new jobs target in the short-medium term.</p>	Noted.	N	
71	Land owner	Caroline	McDade	Mapletree Investments	3		Places		P4		<p>Modifications have also been made to draft Policy P4: Park Royal West amending the number of new jobs and homes to be created within Park Royal sites outside of Strategic Industrial Locations (SIL) to 120 jobs and 575 homes, to be delivered to reflect the Brewery Cluster, First Central and Lakeside Drive site allocations. Mapletree supports the modification as this policy has been updated to reflect the inclusion of the Site's draft allocation.</p>	Noted.	N	
71	Land owner	Caroline	McDade	Mapletree Investments	4		Tall Buildings Statement Update				<p>OPDC's Tall Buildings Statement has been updated and is included as part of the consultation documents. The Tall Buildings Statement Update (May 2021) refers to the definition of a tall buildings as having a minimum of 15 storeys or a minimum of 48 metres above ground level. The areas where tall buildings will be appropriate have been updated to reflect the changes in land uses and development sites. It identifies that the whole Brewery Cluster in the west of Park Royal is appropriate for tall buildings. The Site is located within the Brewery Cluster and therefore, Mapletree supports this update to permit tall buildings to be constructed on the Site, particularly given that developing a tall building will allow the Site+U455 to maximise its capacity and viability, delivering much needed homes and commercial floorspace for the area.</p>	Noted.	N	

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71	Land owner	Caroline	McDade	Mapletree Investments	5		Strategic Policies		SP10		<p>Summary</p> <p>In summary, Mapletree is pleased to have the opportunity to provide representations in response to OPDC's Main Modifications consultation. Mapletree strongly supports the draft allocation for the Site to deliver a minimum of 300 additional homes and a minimum of 500 sqm of commercial or industrial floorspace. Future residential-led development at the Site will help OPDC and LB Brent achieve its housing and jobs targets over the plan period.</p>	Noted.	N	
72	Local Resident	Maren	Strandevold		1		General	Delay or withdraw the plan			<p>I set out below my views on why the March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak. Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, I share the view of a number of local residents and interested groups that a fresh start should be made on a better Plan that works better for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid and reflect on the impacts of Brexit. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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72	Local Resident	Maren	Strandevold		2		Strategic Policies		SP7		<p>HS2 construction will be ongoing for at least another 10 years as the project is woefully behind schedule. This means that it is going to be at least 10 years before there is an operational station. Query how long it will take before the connection to Crossrail and central London will be up and running, which is of course the connection that those living locally will be most affected by as we understand that the passengers from HS2 are largely expected to be passing through rather than stopping in Old Oak (from recollection, around 80% of HS2 passengers are expected to pass through and use Old Oak as an interchange only). Therefore, for a very long time, the only available route to central London is on the central line via East Acton or North Acton. Even now as we ease out of the restrictions on travel, the central line is already suffering issues of overcrowding, and the platforms at both North Acton and East Acton were beyond full capacity prior to the pandemic. In those circumstances, it seems that developments in the transport infrastructure must be much more advanced before proceeding with ambitious building programs.</p>	<p>No change proposed. OPDC will continue to work closely with HS2 to ensure that Old Oak Common station is delivered as soon as possible. Willesden Junction also provides London Overground and Underground services to central London.</p> <p>OPDC's Infrastructure Delivery Plan sets out the phasing of supporting transport infrastructure which will be delivered alongside development sites coming forward.</p>	N	
72	Local Resident	Maren	Strandevold		3		Places		P8		<p>I would also add that when I purchased my property in 2019, I reviewed the publicly available documents at the time. These all suggested that there would be protections for Wells House Road, including a commitment not to build beyond 4 stories within 200 meters of Wells House Road. The road was also indicated to be of historical interest. These plans and safeguards, to ensure that this pocket of important local history are preserved, seem to have gone out the window. This is unacceptable and the plan not to build beyond 4 stories within 200 meters of Wells House Road should be reinstated.</p>	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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72	Local Resident	Maren	Strandevold		4		General	Delay or withdraw the plan			<p>· 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. Property sales outside of London are booming as fewer people are tied to a physical work place and people are looking for more space, including usable outdoor space.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
72	Local Resident	Maren	Strandevold		5		General	Extent of changes			<p>· The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that '<i>most of the Plan remains the same</i>' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. I would point again to my point above - the suggestion that no high rises would be built within 200 meters of Wells House Road was an important factor in my decision to purchase this property.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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72	Local Resident	Maren	Strandevold		6		General	Extent of changes			New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
72	Local Resident	Maren	Strandevold		7		Strategic Policies		SP7		<p>· OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. As per my comments above, the transport infrastructure must be in place before big new developments are considered. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1</p>	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
72	Local Resident	Maren	Strandevold		8		Strategic Policies		SP7		<p>· The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. There appears to be a suggestion that the canal towpath may be an acceptable road, however, this is already suffering from overcrowding on a very narrow footpath. Major Modification Figure/PS2/OPDC/PM2</p>	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	

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72	Local Resident	Maren	Strandevold		9		Transport		T4		<p>· High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area.</p>	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	
72	Local Resident	Maren	Strandevold		10		Strategic Policies		SP9		<p>· High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal, the risks of further future lockdowns and the fact that many people are less tied to a physical workplace and therefore want a space that is of a sufficient size to work and live in. Moreover, more value is now attached to outdoor space, such as gardens and parks. High rises are suffering, and many residents in new build blocks are finding that they simply cannot sell their properties because demand for such accommodation has plummeted. It should be noted that very few high-rises have accommodation that is suitable for families, whereas it is my understanding that the most pressing need for additional housing in London is in fact for families. We already see that the local high-rises have been turned into student living and foreign investment ownerships, they are not being used to house those in need and such use of the accommodation does nothing to drive down over-inflated house prices. Additionally, the transient nature of the population means a lack of a sense of community. Transient populations are not invested in their local area in the same way as owner occupiers and it leads to higher rates of crime and a sense of disconnect.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid and reflect on the impacts of Brexit. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
72	Local Resident	Maren	Strandevold		11		General	Delay or withdraw the plan			<p>· We would ask for the plan to plan to be held back until we see the impact of Oaklands and high rises in North Acton before blighting the area with further towers. We have seen evidence that the new blocks in North Acton as left mainly empty.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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72	Local Resident	Maren	Strandevold		12		Strategic Policies		SP6		<p>· The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for '<i>major town centre uses</i>' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population, and many retail units are left empty for prolonged periods of time. This was the case even before the pandemic. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a</p>	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
72	Local Resident	Maren	Strandevold		13		Places		P8		<p>· Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. As referenced above, there were previous assurances that there would be no high rises within 200 meters of Wells House Road and HS2 had promised that this would be green space and is still indicating this on their maps. This would block out the light for residents and render gardens unusable.</p>	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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73	Local Resident	Miss	Purcell		1		Places		P10		<p>I AM STRONGLY OPPOSED TO THE PLANNING APPLICATION TO BUILD ON THE BOUNDARY OF LITTLE WORMWOOD SCRUBS.</p> <p>I am a regular user of the Little Wormwood Scrubs.</p> <p>This is a rare public space, and should not be built on, nearby.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

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73	Local Resident	Miss	Purcell		2		Places		P10		<p>I live on Oxford Gardens, and the Open skylines from my flat, and of Wormwood Scrubs and Little Wormwood Scrubs are being destroyed by the impact of tall buildings in all directions.</p> <p>This was a part of London which until recent years had open views, and green space, that felt on the edge of the city, rather than inner city – a rare feature that should have been maintained for all Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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73	Local Resident	Miss	Purcell		3		Strategic Policies		P10C5		<p>This is a sham consultation. Consultation by OPDC on the 'modifications' has been inadequate. Proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan. This is a significant revision to plans for the area, and more than a last minute 'modification'. We are not fools, and we should not be treated as such.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. The phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
73	Local Resident	Miss	Purcell		4		General	Delay or withdraw the plan			<p>Local people do not understand why plans should be fixed now, when the HS2/Elizabeth Line station will not open for a decade. Why not wait to see the impact of the pandemic on London's housing needs and travel patterns, and start again on a better Local Plan? Is it because you wish to bulldoze through these plans, regardless of the adverse affect it has upon this community, our green spaces, and our quality of life?</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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73	Local Resident	Miss	Purcell		5		Strategic Policies		SP9		<p>After the tragedy at Grenfell Tower, local residents should be afforded more respect, but that has not been borne out. I would respectfully request that you show local residents respect, and reconsider this decision. We do not agree with these buildings. I hope this is clear to you. Please contact me for any further information that you may require.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
74		Margaret	Kassardjian		1		Development Capacity Study Update				<p>Why have the planned period homes been reduced? Why has the plan period economic floor space been increased?</p>	<p>No change proposed. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>Due to the retention of Old Oak North as SIL, alternative housing sites have been identified resulting in a minor reduction in plan period homes. Economic floorspace has increased reflecting the modified industrial development capacity within the retained SIL sites and additional office floorspace on other sites.</p>	N	
74		Margaret	Kassardjian		2		Development Capacity Study Update				<p>Why have jobs been reduced? Why more office floor space and less homes? Who are the land owners? What are their requirements?</p>	<p>No change proposed. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>Due to the retention of Old Oak North as SIL, alternative housing sites have been identified resulting in a minor reduction in plan period homes, whilst still maintaining general conformity with London Plan housing targets. Economic floorspace has increased reflecting the modified industrial development capacity within the retained SIL sites and additional office floorspace on other sites.</p>	N	

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74		Margaret	Kassardjian		3		Grand Union Canal				What are the site specific considerations?	No change proposed. Site specific considerations will vary but may include considering the impact on heritage assets, environmental designations, residential amenity, local legibility and viability considerations.	N	
74		Margaret	Kassardjian		4		Industrial Land Review Addendum				What else would the land be used for if SIL designation in Old Oak North was not retained?	No change proposed. OPDC considered that the Inspector's Interim Findings would have resulted in little planning certainty for Old Oak North if de-designated from Strategic Industrial Location (SIL). This would have provided businesses with limited planning certainty on which to continue and/or expand economic activities. Therefore the SIL designation is proposed to be retained.	N	
74		Margaret	Kassardjian		5		Infrastructure Delivery Plan				What are the consequences if funding not met - contingency plans?	<p>No change proposed. OPDC considers the proposed modifications are effective ensuring the Local Plan is sound. OPDC's supporting studies demonstrate how development and infrastructure will be funded and is deliverable. Key documents include the OPDC's Whole Plan Viability Study and Strategic Sites Viability Assessment.</p> <p>The amended infrastructure requirements set out in the proposed modifications result in a smaller infrastructure funding gap.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p> <p>A series of Statements of Common Ground alongside consultation responses from stakeholders demonstrate the proposed modifications have been positively prepared resulting in a Local Plan that OPDC considers is sound.</p>	N	
74		Margaret	Kassardjian		6		Social Infrastructure Needs Study Update				Why is the health hub to be moved from Old Oak North to North Acton and Acton Wells?	<p>No change proposed. The proposed modification to change the location of the health hub has been made in response to the Inspector's Interim Findings and the continued designation of Old Oak North as Strategic Industrial Location.</p> <p>North Acton and Acton Wells has been identified as an area of search reflecting availability of development sites and it's accessibility by public transport and active travel networks. This has been agreed by the North West London Clinical Commissioning Group.</p> <p>This information is set out in the Social Infrastructure Needs Study Update.</p>	N	

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75	Local Resident	Marianne	MacDonald		1		General	Extent of changes			I very strongly oppose the Plan, which appears to have undergone very considerable modifications, despite the claims that it is essentially unchanged. As somebody who lives in the area and understands the infrastructure well, I am convinced that the plan fails for a number of reasons	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
75	Local Resident	Marianne	MacDonald		2		Strategic Policies		SP9		<p>It is prepared proposing high density housing, within a couple of miles of the Grenfell tower, which has proven that high density housing has no place in current residential planning. Such buildings will also destroy the skyline around the area, which is much prized by the local residents.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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75	Local Resident	Marianne	MacDonald		3		Places		P10		Additionally, the local roads are narrow and overburdened, and we already have long queues almost daily at the junction of Latimer Road, North Pole Road and scrubs lane. Whilst the proposals may suggest that the residents will be "car free" this will not be the case given that they will drive considerable taxi and delivery bike/car/van use. The local roads are already unable to support the flow of traffic and will not be able to support any additional traffic.	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. In line with OPDC's sustainable transport hierarchy, movement by foot, bike and public transport has been prioritised across the OPDC area to reduce private car trips. In addition, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.	N	
75	Local Resident	Marianne	MacDonald		4		General	Delay or withdraw the plan			. Following the pandemic, it is clear that deep structural changes are underway in working trends and between the city and the country, without flows from London. This is not the moment to be making this kind of investment,, particularly when the area is industrial, poorly served, and will no longer be supported by the tube stations originally planned.	No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	
75	Local Resident	Marianne	MacDonald		5		Employment		E2		With the relaxation of planning rules, I strongly suggest it would be better to re-purpose the offices that will fall are already proving to be unlettable, for residential use, then to blight this part of London with a development that is unlikely to be workable.	No change proposed. Local planning authorities are required to plan to meet identified needs, including the need for housing and economic development. OPDC Local Plan policies show how development will meet housing targets and deliver well designed housing in the right place, of the right type (affordabilities and size) and secure financial contributions to deliver infrastructure (schools, healthcare etc) alongside the delivery of housing. Permitted development rights that allow the change of use from office to residential use do not deliver the same benefits. Permitted development does not require matters such as affordable housing or amenity space provision to be considered with change of use applications.	N	

76	Statutory Consultee	Lucinda	Robinson	Marine Management Organisation	1	General	General	<p>Please see below suggested policies from the Draft South East Inshore Marine Plans that we feel are most relevant to your local plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed:</p> <ul style="list-style-type: none"> • SE-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. • SE-INF-2: (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported. (2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities. (3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport. (4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate significant adverse impacts on existing landing facilities • SE-EMP-1: Proposals that result in a net increase to marine related employment will be supported, particularly where they meet one or more of the following: <ul style="list-style-type: none"> i) create employment in areas identified as the most deprived, or ii) support and are aligned with local skills strategies and the skills available in and adjacent to the south east inshore marine plan area, or iii) create a diversity of opportunities, or iv) implement new technologies. • SE-CC-1: Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate significant adverse impacts, or, as a last resort, d) compensate and deliver environmental net gains in line with and where required in current legislation. • SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change. • SE-CC-3: Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate the significant adverse impacts upon these climate change adaptation measures. • SE-AIR-1: Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements. • SE-ACC-1: Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise 	No change proposed. The OPDC area is not located within the areas identified within the East, South or South East inshore marine plans.	N
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											<p>c) mitigate significant adverse impacts on public access.</p> <ul style="list-style-type: none"> • SE-TR-1: Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate that impact. • SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate d) compensate for significant adverse impacts. • SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate significant adverse impacts d) compensate for significant adverse impacts. • SE-BIO-3: Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate d) compensate for net habitat loss and deliver environmental net gain. <p>Further points to note</p> <p>The East Inshore and East Offshore Marine Plans were adopted in 2014, and the South Inshore and Offshore Marine Plan was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included.</p> <p>I believe your council did not attend a South East Marine Plan Implementation Training session in March 2021. This provided an introduction to marine planning, and I would suggest re-visiting the material in our recorded webinar which supported the Consultation of the draft South East Marine Plan. Please let me know if you have any questions regarding implementation of the marine plan.</p> <p>As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information: South East Marine Plan and Explore Marine Plans.</p>			

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77	Local Resident	Mark	Packwood		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
77	Local Resident	Mark	Packwood		2		Design		D3, D4		<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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77	Local Resident	Mark	Packwood		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
77	Local Resident	Mark	Packwood		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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77	Local Resident	Mark	Packwood		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
77	Local Resident	Mark	Packwood		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
77	Local Resident	Mark	Packwood		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
77	Local Resident	Mark	Packwood		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	

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77	Local Resident	Mark	Packwood		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
77	Local Resident	Mark	Packwood		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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77	Local Resident	Mark	Packwood		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
77	Local Resident	Mark	Packwood		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would block out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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77	Local Resident	Mark	Packwood		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
77	Local Resident	Mark	Packwood		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
78	Local Resident	Mark	Walker		1		General	General			<p>I am a resident of the Old Oak Lane Conservation Area and I am writing in response to the public consultation on the OPDC Modified Plan closing at midnight tomorrow, Monday, July 5.</p> <p>I believe the Modified Local Plan is unsound for these reasons set out below.</p>	<p>Noted.</p>	N	
78	Local Resident	Mark	Walker		2		Strategic Policies		SP6		<p>The OPDC's 2021 Draft Local Plan wants the Channel Gate site for 'major town centre uses' with high density and high rise buildings, which is unrealistic and an overdevelopment of that area. Locating high rise buildings at Channel Gate will have nothing in common with the high rise blocks at North Acton - it is not credible for the OPDC to say in a planning document that somehow they are both part of a 'town centre' - there are entirely separate locations.</p>	<p>No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p>	N	

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78	Local Resident	Mark	Walker		3		Places		P9		Any high rise and large buildings built on the eastern side of Channel Gate area / Willesden Euroterminal Yard) will dominate the low-rise Old Oak Lane residential area (island triangle residential area) and undermine its attractive setting.	<p>No change proposed.</p> <p>Policy P9 places a strong emphasises on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the area's heritage.</p> <p>Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p>	N	
78	Local Resident	Mark	Walker		4		Places		P9		In addition, the Channel Gate area only has only one access road which joins Old Oak Lane, so traffic on the A4000 will get worse. This is not careful strategic development - it is the OPDC making a tactical switch after failing to develop the Car Giant site; the amount of development proposed for Channel Gate is not sustainable.	<p>No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel.</p> <p>The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site.</p> <p>The Local Plan's transport chapter includes a series of planning policies which seek to promote the use of sustainable travel modes, minimise car parking levels and minimise the impacts of development on the highway network during construction.</p>	N	
78	Local Resident	Mark	Walker		5		Places		P9		2. The modified Local Plan's idea of using Channel Gate / Willesden Euroterminal Yard for high density high rise housing creating 3,100 units is not sound. Building at such heights will dominate and degrade the existing low rise residential areas - this proposal has been inadequately consulted on and should not be introduced as a 'modification' at this very late stage of the plan's development.	<p>No change proposed.</p> <p>Policy P9 places a strong emphasises on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement.</p>	N	

78	Local Resident	Mark	Walker	6	General	Extent of changes	<p>Because face to face meetings were not possible in the pandemic and by offering limited online sessions, the OPDC has in effect kept such a radical change to its local plan – moving housing from the Car Giant site to new sites by existing homes – hidden from local people.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be 	N
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78	Local Resident	Mark	Walker		7		Places		P9		In different places, this plan's numbers for Channel Gate are awry: Policy P9 refers to a 3,100 homes being planned for the area and Policy P8 2,750 homes over the plan's period - which suggests the indecent haste with which this idea has been advanced. This policy represents over-development of one site and should be reconsidered and it certainly needs much more detailed public consultation.	<p>available in Braille or audio format.</p> <ul style="list-style-type: none"> • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N	

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78	Local Resident	Mark	Walker		8		Strategic Policies		SP9		<p>3. The OPDC's assumption through the draft plan that high rise offices and housing is the basis of future communities is highly questionable – all the more so because the issue of safe cladding of tall buildings after the Grenfell disaster still hasn't been sorted out and, post pandemic, the fact that much of the workforce wants to stay working at home or in smaller community resources, rather than high-rise, town centre offices. For example, ONS data from early in the pandemic suggest that more than half of Londoners had done some work at home and in 2021 its research showed that 85% of employees want to retain some form of hybrid or remote working.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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78	Local Resident	Mark	Walker		9		Strategic Policies		SP9		Throughout the document, there is an underlying assumption that developments like Channel Gate or Victoria Road will have "tall buildings" - which is the OPDC's euphemism for 40, 50 & 60 storey high rise buildings although it is too secretive and anti-democratic to say it openly in the documentation - in the centre of each development site.	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. OPDC' Tall Buildings Statement defines a tall building as above 15 storeys.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p>	N	
78	Local Resident	Mark	Walker		10		Places		P9		The documentation also proposes having buildings of 6-10 storeys at the margins of these development sites - which a normal member of the public would regard as a "tall building" anyway. For example, Chapter 4 on Channel Gate proposes having buildings of -10 storeys fronting the Grand Union Canal at Channel Gate - but having buildings of 8-10 storeys will fundamentally change the character of the Grand Union Canal for ever - which proposal does not align in any case with the draft plan's policy Chapter 4, 4.49 which proposes widening the canal in an attempt at "conserving and enhancing the character of the canal". Having such tall buildings along the Grand Union Canal will overwhelm the existing Old Oak Lane Conservation Area (island triangle residential area) which comprises two-storey cottages.	<p>No change proposed.</p> <p>Policy P9 says that proposals should deliver heights of generally 6 to 8 storeys adjacent to the Grand Union Canal. This is consistent with guidance for heights along the length of the canal, and is evidenced by the Grand Union Canal Massing and Enclosure Study.</p> <p>Policy P9 places a strong emphasises on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p>	N	
78	Local Resident	Mark	Walker		11		Places		P7		The plan's obsession with high rise and high density building also permeates Policy 7 for North Acton and Acton Wells which proposes "tall buildings across North Acton and Acton Wells in appropriate locations in accordance with policies SP9, D54" - "generally 10 to 12 storeys along Victoria Road north of Old Oak Street," P7, 3.15 within Acton Wells East, "generally 10 to 12 storeys along Victoria Road north of Old Oak Street". Given that 10 -12 storeys is therefore the plan's benchmark for building heights at the edge of this area, existing residential areas will be simply overwhelmed and ruined by these expectations of much higher buildings in Old Oak. The plan's proposal for "generally lower heights adjacent to sensitive locations including ...Wells House Road, Midland Terrace and along Jenner Avenue" is not credible either; building heights near these locations and the island triangle should be commensurate with them - i.e. be no more than two storeys high, so their essential and attractive Victorian/Edwardian character is retained and conserved.	<p>No change proposed. The building heights policies have not been amended as part of the proposed modifications for North Acton and Acton Wells. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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78	Local Resident	Mark	Walker		12		Places		P8C1	4.153	Chapter 4.153 proposes keeping development to the height of The Collective, the ten-storey building adjacent to the Grand Union Canal proposing that "Development of the Willesden Junction Maintenance Depot and sites to the south should reflect the existing height of The Collective in the north of the site and decrease to respond to the existing Victoria Terrace." This vague and unfair: development adjacent to Victoria Terrace must be kept to two stories given that the terrace is two story houses - these proposals will destroy the character of Victoria Terrace if enacted.	No change proposed. Modifications were not proposed for policy P8C1(g). OPDC considers the policy is sound and justified reflecting wider building heights guidance in policy P3 for canalside locations.	N	
78	Local Resident	Mark	Walker		13		Strategic Policies		SP6		Proposing building at this height fundamentally changes the amenity of existing residential areas so much that this policy requires further consultation with local communities. The draft plan's obsession with high rise will destroy the character of the existing residential areas. Local people in Old Oak who have visited the redeveloped Stonebridge Park estate only one mile to the North, can see that 4-5 storey developments have created far more attractive and sustainable communities than is being proposed for Channel Gate Road and the expansion of North Acton. The plan's and modifications' assumptions about the type of homes and buildings people want to live and working are outdated and unsound.	No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development. The main modifications consultation was undertaken in accordance with OPDC's Statement of Community Involvement. Any future planning applications involving a tall building would also undergo public consultation.	N	
78	Local Resident	Mark	Walker		14		Strategic Policies		SP7		4. In the draft plan, OPDC claims that these new proposed housing locations such as Channel Gate, Victoria Road will be "well connected" but the idea for the new Overground stations for Old Oak has been dropped, so these locations will not have adequate public transport and their development in this manner with such inaccurate assumptions will add to the area's traffic problems and overcrowded Tube trains that the community was seeing, even before HS2 started its construction work.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	
78	Local Resident	Mark	Walker		15		Places		P9		This failure to take account of how poorly connected the Willesden Euroterminal Site means that proposals that might be reasonable in other contexts could be ruinous for the island triangle community in others ways: a prime example is Policy P9 and figure 4.9A. with their proposals for "new and improved walking and cycling routes throughout Channel Gate, including new accesses to Old Oak Lane" - the addition of pedestrian traffic from 3,100 homes and industrial sites have – given the poor connectivity highlighted - the potential to undermine and destroy the character of the Old Oak Lane conservation Area / island triangle residential area and far more public consultation is needed before these proposals can be enacted.	No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel. The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site.	N	

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78	Local Resident	Mark	Walker		16		General	Delay or withdraw the plan			<p>My conclusion is that these modifications to the Plan are poorly considered and the evidence does not justify their inclusions – the proposed changes are unsound. These modifications should not be introduced to the Local Plan at this late stage and the process is unsound. Sadly, these changes smack of panic measures by the OPDC to help attain the Mayor's ambitious housing targets - particularly following the OPDC's loss of the Car Giant site's contribution to the plan's overall target – rather than considered and strategic planning properly supported by evidence.</p> <p>These rushed changes will fundamentally harm existing residential communities - especially Wells House Road, Midland Terrace/Shafesbury Gardens and the island triangle residential community - as the Local plan seeks to create new communities. As such the modifications need much more thorough public consultation than the very limited consultation events held earlier this year. I urge the Mayor and the corporation to rethink these modifications and design much more sustainable new communities and carry out much more effective public consultation for the redevelopment of Old Oak and especially for the Channel Gate area / Willesden Euroterminal site post HS2's construction. Yours sincerely</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
78	Local Resident	Mark	Walker		17		General	Support for community group comments			<p>Confirming that I support the comments made in the Old Oak Neighbourhood Forum response to the OPDC Modified Local Plan public consultation which is closing today.</p>	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.</p>	N	

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79	Local Resident	Martin	Murphy		1		General	General			I am a resident in W12 (30 years plus), an architectural professional, a keen runner and regular recreational user of Wormwood Scrubs. I am also trustee of a local community football club. The club uses Wormwood Scrub's football pitches extensively to train and play competitive football from U11s to senior levels.	Noted.	N	
79	Local Resident	Martin	Murphy		2		Places		P12		Issues such as the Metropolitan Open Land known as Wormwood Scrubs and its status as a conservation area, already challenged by years of poor management, existing perimeter development, HS2, uncertainty over the Linford Christie Stadium to name but a few. Further ill considered high rise, lacking its own adequate amenity space and sensitive to the local issues will damage the fragility of the Wormwood Scrubs and Little Scrubs and its environs, give rise to increased traffic congestion and pollution on Wood Lane. On this point alone, I strongly object to the OPDC current proposals as irreversible harm will be done.	No change proposed. As a Metropolitan Park, Wormwood Scrubs will be a valuable asset for those living, working and visiting Old Oak, as it is for entire West London region and further afield. The Local Plan protects Wormwood Scrubs as an area of Metropolitan Open Land and ecological habitat and seeks to secure sensitive enhancements to both its leisure and ecological functions. However, development identified within the Local Plan will not rely on Wormwood Scrubs or any other existing green spaces. The Local Plan requires proposals to ensure that 30% of developable land outside of SIL is delivered as publicly accessible open space. This includes the delivery of two new Local Parks, of a minimum 2 ha in size, and a series small public open spaces serving a variety of functions.	N	

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79	Local Resident	Martin	Murphy		3		Places		P10		<p>Scrubs Lane is the wrong location for high density living with inadequate transport links, little amenity and public places, lack of employment zones and few schools. What evidence, other than marketing hubris, suggests that people want to live there and now in particular as we emerge from the pandemic. I have lived adjacent to North Pole Road for over 30 years and the parade of shops has seen little or no improvement in that time despite the dense residential demand; the only decent pub has gone with the rumour that the remaining Pavilion pub is on its last legs. What hard evidence is there that dense high-rise development is going to thrive like the marketing brochures predict.</p> <p>I object strongly to the high rise development along Scrubs Lane.</p>	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	

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79	Local Resident	Martin	Murphy		4		General	Extent of changes			<p>The recent consultation states “ much of the draft local plan has not charged.” This is Not true and is misleading. I strongly object to being deliberately misled by a public body and suggest that misleading comments are withdrawn and a new and open consultation is undertaken under the chairmanship of a credible and qualified person of high standing in urban development matters.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
79	Local Resident	Martin	Murphy		5		Places			P10	<p>Chaotic levels of current traffic grid lock and pollution along Wood Lane/ Scrubs Lane and North Pole Road should make the OPDC reconsider the current proposal. I object strongly to the current plan without adequate traffic consideration and plans for a future sustainable city.</p>	<p>No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. In line with OPDC's sustainable transport hierarchy, movement by foot, bike and public transport has been prioritised across the OPDC area to reduce private car trips. In addition, the Local Plan includes policies to control car parking levels and reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	
79	Local Resident	Martin	Murphy		6		Places			P12	<p>Returning to the football club reference in the first paragraph, I also write as a trustee of a community club of 100s of local youthful footballers who use the Scrub's football pitches and facilities regularly. I object to the open space of Wormwood Scrubs being taken as justifiable amenity space for ill considered high rise residential development. Football, Hockey, Baseball, Lacross and Gaelic Football clubs all play competitive sport on the sports fields and together with the conservation area to the west, the metropolitan open land is for all of London to enjoy and cannot be assigned as being particular to any new high density development. I strongly object to the lack of planned open space, amenity and recreational facilities for the well being of future residential in the ill considered high rise development.</p>	<p>No change proposed.</p> <p>As a Metropolitan Park, Wormwood Scrubs will be a valuable asset for those living, working and visiting Old Oak, as it is for entire West London region and further afield.</p> <p>However, development identified within the Local Plan will not rely on Wormwood Scrubs or any other existing green spaces. The Local Plan requires proposals to ensure that 30% of developable land outside of SIL is delivered as publicly accessible open space. This includes the delivery of two new Local Parks, of a minimum 2 ha in size, and a series small public open spaces serving a variety of functions.</p>	N	

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79	Local Resident	Martin	Murphy		7		Strategic Policies		SP9		<p>In conclusion, my comments should be taken as critical to the extent that a considerable re think is required for the OPDC development to be acceptable. Appropriate Aesthetic and Urban Design leadership is lacking across the spectrum and should be addressed before another consultation otherwise irreversible harm in West London will ensue and wholesome opportunities missed.</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and facilitate the development of the area. This will support the delivery of sustainable high quality development across the OPDC area and deliver benefits for Londoners and local people.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Major development proposals are also shaped by OPDC's Place Review Group which comprises leading practitioners across multiple built environment disciplines.</p>	N	

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80	Local Resident	Martina	Margetts		1		Places		P10		<p>As a local resident in North Kensington, I recognise there may be a need to build additional housing provision in the surrounding area, but this plan is not appropriate - in terms of the proposed height and density of the buildings, their location in relation to the open public green and recreational spaces of Wormwood Scrubs and Little Wormwood Scrubs and the complete absence of adequate transport links.</p>	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	

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80	Local Resident	Martina	Margetts		2		General	Support for community group comments			I support the representations made by the StQW Forum.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
80	Local Resident	Martina	Margetts		3		General	Delay or withdraw the plan			A wholly new Local Plan must be thought through.	<p>No change proposed. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and facilitate the development of the area. This will support the delivery of sustainable high quality development across the OPDC area and deliver benefits for Londoners and local people.</p> <p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p>	N	
81	Local Resident	Mary	Lambert		1		General	Support for community group comments			I am writing to support the views of the St Quintin and Woodlands Neighbourhood Forum and object to your plans as they now stand.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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81	Local Resident	Mary	Lambert		2		Places		P10		I am concerned about the increase of traffic in an area which already has traffic problems at peak times.	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. In line with OPDC's sustainable transport hierarchy, movement by foot, bike and public transport has been prioritised across the OPDC area to reduce private car trips. In addition, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.	N	
81	Local Resident	Mary	Lambert		3		Strategic Policies		SP9		Also the proposal to build high rise buildings. We have enough of these already.	No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.	N	
81	Local Resident	Mary	Lambert		4		General	Delay or withdraw the plan			Please re-consider what is more suitable for this neighbourhood. Thank you.	No change proposed. Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	

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82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	1		General	General			<p>Thank you for consulting the Mayor of London on the proposed Main Modifications to OPDC's Local Plan following the Examination Hearing sessions. 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 provided comments on the Regulation 19 version of the draft OPDC Local Plan on 27 July 2018 (Reference: LDF40/LDD01/DR01) and agreed a Statement of Common Ground with OPDC on 4 February 2021.</p> <p>The London Plan 2021 was formally published on the 2 March 2021, and now forms part of OPDC's Development Plan and contains the most up-to-date policies.</p> <p>The Mayor has carefully considered the proposed main modifications and is of the opinion that the draft Local Plan is in general conformity with the London Plan 2021 (LP2021).</p> <p>The Mayor has afforded me delegated authority to make more detailed comments on his behalf which are set out below. Representations from Transport for London (TfL), which I endorse, are included and attached to this response.</p> <p>1 https://consult.opdc.london.gov.uk/9276/widgets/26419/documents/12105</p>	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	2	MM/PS2/OPDC/SP/2	Strategic Policies			3.3	<p>The Mayor notes and welcomes the updated housing target which is in line with the agreed Statement of Common Ground. The projected employment numbers are slightly lower than what was agreed in the Statement of Common Ground with the Mayor but it is noted that the newer figure is based on the latest information available and is acceptable.</p>	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	3	MM/PS2/OPDC/SP/6	Strategic Policies		SP4		<p>The Mayor notes and welcomes the updated housing targets which are in line with the agreed Statement of Common Ground and set out a commitment to meet OPDC's housing target to deliver 13,670 new homes between 2019 and 2029 as set out in Table 4.1 of the LP2021.</p>	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	4	MM/PS2/OPDC/SP/9	Strategic Policies		SP5		<p>It is recognised that the projected employment numbers are slightly lower than what was agreed in the Statement of Common Ground with the Mayor but it is noted that the newer figure is based on the latest information available and is acceptable.</p>	Noted.	N	

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82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	5	MM/PS2/OPDC/SP/5	Strategic Policies			3.8	Welcome the additional work on industrial intensification at Old Oak North and how this will contribute towards the Plan's growth aspirations.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	6	MM/PS2/OPDC/SP/12	Strategic Policies			3.26	Welcome the modification, which is in line with the Statement of Common Ground with the Mayor and establishes clearly the uplift in industrial capacity that can be brought about on other sites in the OPDC area.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	7	MM/PS/Q12Q13Q16(2)	Places			P7, P4, P5 & supporting figures	Welcome the modification, which provides clarity that the listed waste sites are safeguarded as part of the West London Waste Plan.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	8	MM/PS2/OPDC/P4/4	Places		P4	4.58	Welcome the modification as it reflects LP2021 Policy SI9 which makes compensatory capacity a necessary requirement if the safeguarded waste site was to be redeveloped.	Noted.	N	

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82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	9	MM/PS2/OPDC/P5/2	Places		P5	4.86	Welcome the modification as it reflects LP2021 Policy SI9 in order to seek compensatory capacity if the safeguarded waste site was to be redeveloped.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	10	MM/PS2/OPDC/P7/7	Places		P7	4.108	Welcome the modification as it reflects LP2021 Policy SI9 in order to seek compensatory capacity if the safeguarded waste site was to be redeveloped.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	11	MM/PS2/OPDC/P10/2	Places		P10		The Mayor supports residential-led mixed use development along Scrubs Lane. Housing delivered here will make a positive contribution in meeting OPDC's housing target as set out in the LP2021.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	12	MM/PS2/OPDC/P10/10	Places		P10	4.17	The proposed modifications are welcomed. With the focus on place-making and supported by the Scrubs Lane Development Framework Principles Update, this area presents a good opportunity for high quality residential-led mixed use development which can capitalise on its pivotal location. It will benefit from its proximity to Old Oak Common Station, Harlesden Town centre, Willesden Junction Station and the Kensal Canalside and White City Opportunity Areas.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	13	MM/PS2/OPDC/EU6/1	Environment and Utilities			6.69	Welcome the intention to bring forward an up-to-date West London Waste Plan which will take into account the apportionment targets set out in the LP2021.	Noted.	N	

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82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	14	MM/PS/OPDC M9(5) MM/PS/OPDC M9(6)	Housing			8.23, 8.24 & 8.25	The Mayor welcomes the stronger emphasis on the delivery of much needed social rent and London Affordable Rent homes.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	15		Strategic Policies		SP9		Directions received from the Secretary of State in December 2020 in relation to the London Plan 2021 resulted in changes to Policy D9 Tall buildings. In light of those changes, OPDC's approach to tall buildings as set out in the Tall Buildings Statement Update (May 2021) and the draft Plan is consistent with the approach in the LP2021.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	16		General	General			General: The general emphasis in the draft Local Plan is aligned with TfL policies and priorities; it makes appropriate references to MTS objectives, e.g. Healthy Streets, however we would recommend referring to Vision Zero in relation to any relevant road safety policies.	No change proposed. OPDC will support the Mayor and TfL in achieving the aspirations for Vision Zero. However, this modification is not required to respond to the Inspector's requests including the Interim Findings.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	17		Strategic Policies		SP7		<p>General: We welcome the agreements reached in the Statement of Common Ground on a range of topics and as such are generally supportive of the transport policies contained within the Local Plan. There are some areas where we consider it would be beneficial to undertake additional work, as detailed below, but are satisfied that this can be done later and that the outputs would have no material impact on the contents of the current Local Plan:</p> <ul style="list-style-type: none"> o we recommend there is a commitment to undertaking a future refresh of the existing Transport Strategy. The current transport strategy, although still adequate and fit for purpose in terms of modelling the overall scale of development being proposed for the area, is based on what is now relatively old data. As land uses, capacities and phasing begin to become more clear, there is a need for the strategy to be updated. This needs to include reviewing the impact on junctions along the A40. This is agreed in the SoCG and given the impact Covid is having on travel patterns, we agree it makes sense to undertake additional work in the future. o There is a need to develop a separate Walking and Cycling Strategy for area to provide additional detail for the area and to build on what is within the Local Plan, which is considered acceptable for now. o There should be a commitment to developing a monitoring strategy (in collaboration with TfL) with evaluation triggers, if the mode shift is not being achieved. Adding a sentence to cover developing this in the future would be sufficient. 	Noted. OPDC notes the recommendations and looks forward to working with Transport for London and other stakeholders in developing these future strategies. OPDC has a list of Key Performance Indicators, which will be monitored through OPDC's Authority Monitoring Report. This includes, inter alia, monitoring of car parking/cycle parking provision and other transport measures and will be used to monitor the effectiveness of OPDC's planning policies.	N	

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82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	18		Places				Places: Footway widths should be appropriate for pedestrian demands with an aim of achieving a B+ pedestrian comfort level (PCL). This is a TfL requirement (as per TfL's Pedestrian Comfort Guidance).	No change proposed. The purpose of a Local Plan is not to provide detailed design for proposals but to provide policy support to facilitate future design work. OPDC will be developing more detailed design guidance on this and other matters within a forthcoming Public Realm Supplementary Planning Document.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	19		Places			4.18	Para 4.18: This includes a new reference to the potential provision of a local park on the Elizabeth line depot site. We previously raised the following comments in relation to development on the depot site and these continue to apply: 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.	Noted. Development of the Elizabeth line depot is identified to be after the plan period. This is shown on figure 3.16.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	20		Places			4.97	Para 4.97: This refers to a complementary night shuttle bus service for shift workers. It should be noted that this not something that TfL would be in a position to fund/financially support and therefore if this were to be taken forward it would need to be through a private enterprise, which may not be viable.	Noted. OPDC is considering alternative funding sources for this provision.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	21		Design				Design (p105): Maintenance should be at the forefront of securing high quality design to ensure the longevity of the investment. During the design stage it would be valuable to engage with stakeholders with protected characteristics to ensure proposals are inclusive.	Noted. Policy D2 requires applicants to demonstrate whether engagement with relevant stakeholders to accessible and inclusive design have informed proposals.	N	

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82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	22		Transport		T1		Policy T1 (supporting text): Designs should be subject to EqlAs.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	23		Transport		T2		Policy T2: The policy should include applying suitable surface materials and neatly aligned street furniture. This will support legibility and provide easily navigable walking routes, particularly for pedestrians who are disabled, older or with children. Crossing facilities should be provided where there are pedestrian desire lines to improve road safety and directness where there is a demand to cross.	No change proposed. The purpose of a Local Plan is not to provide detailed design for proposals but to provide policy support to facilitate future design work. OPDC will be developing more detailed design guidance on this and other matters within a forthcoming Public Realm Supplementary Planning Document.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	24		Transport		T2		Para 7.16: Consideration of walking routes during all times of day is important. Designing well-lit areas and designing out crime gives greater confidence for more walking at night.	No change proposed. The purpose of a Local Plan is not to provide detailed design for proposals but to provide policy support to facilitate future design work. OPDC will be developing more detailed design guidance on this and other matters within a forthcoming Public Realm Supplementary Planning Document.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	25		Transport		T4	7.29	Policy T4 Parking and 7.29: We support the changes to wording in part A (ii) of this policy and the explanatory text in 7.29 which are necessary to bring the parking policy into line with the London Plan 2021. The requirement for car free development for residential developments located in existing or planned areas of PTAL 4–6b is consistent with policy T6.1 in the London Plan as set out in the TfL Statement of Common Ground.	Noted.	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	26		Transport		T8		Policy T8: TfL has devised its own Temporary Traffic Management Handbook (published January 2019). The specific detail on managing pedestrian and cycling safety during street works should inform this policy.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, OPDC will be developing more detailed design guidance on this and other matters within a forthcoming Public Realm Supplementary Planning Document.	N	

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82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	27		Places		P7		<p>Policy P7: As per our SoCG, we welcome the additional wording to support the safeguarding and potential funding towards Old Oak Common Lane station. There are a few points of clarification needed as follows:</p> <ul style="list-style-type: none"> • The WLO is currently listed as something to be delivered in 21+ years. This should instead be in the 10-20 years category. • Safeguarding for the OOCL station should include the design of the ped/cycle bridge which crosses the railway and should also ensure the necessary provision for when the OOCL station is built. Infrastructure which may come in advance (e.g. the ped/cycle link) must not impact the delivery of the station. • We would welcome strengthened support for the station and WLO which recognises the benefits they would deliver for the area and the attractiveness and value of development. Even if they do not unlock many new homes in the area, OOCL station will improve public transport connectivity. • The text in the plan should be updated to reflect the current stage of development of the WLO scheme. 	<p>Noted. These concerns have been addressed in the following responses (ref. 133/5-10). In regards to the pedestrian/ cycle bridge at Old Oak Common Lane Station, the Infrastructure Delivery Plan sets out that the bridge should be designed to enable future delivery of the proposed Old Oak Common Lane Station (including WLO platforms) without need for a replacement bridge.</p>	N	
82	Statutory Consultee	Hassan	Ahmed	Mayor of London and TfL	28		Places		P2		<p>Policy P2: We are supportive of the additional wording in relation to Willesden Junction station.</p>	<p>Noted.</p>	N	

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83	Local Resident	Miriam	Shea		1		General	Extent of changes			<p>I am writing as a member of the Friends of the Scrubs and a local west London resident. My comments on the modified local plan are as follows: With the loss of the car giant site and two over-ground stations and the addition of two new and distinct building clusters the idea that the plan has only been subject to minor changes or modifications simply doesn't pass muster.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
83	Local Resident	Miriam	Shea		2		General	Extent of changes			<p>The removal of the car giant site which was to be primarily residential without any corresponding reduction in the number of homes proposed is logically unsound;</p>	<p>No change proposed. The proposed modifications to the Old Oak North Policy P2 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. This includes information demonstrating how the Local Plan will continue to meet 2021 London Plan housing targets. This was carried out by identifying updated capacity and phasing information on sites already identified for mixed use development and releasing other sites for mixed use development that were previously identified for industrial uses. This includes the release of the Channel Gate site that was previously identified as a Strategic Industrial Location. This site and other sites means the Local Plan is able to continue to deliver homes and a reduction in the number of homes is not required.</p> <p>Statements of Common Ground have been signed with each of the landowners of sites proposed to be modified demonstrating deliverability.</p>	N	

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83	Local Resident	Miriam	Shea		3		General	Delay or withdraw the plan			The plan takes no account of recent developments- pandemic related changes to work and travel patterns and increasing focus on climate change in particular - and going back to the drawing board rather than pushing through a plan that is not fit for purpose and unsound would be the right way to go. Moreover, given recent developments / changes in local guide lines it seems absurd to continue to follow the prior guidelines.	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

83	Local Resident	Miriam Shea	4	General Consultation	<p>The OPDC has failed to communicate effectively with stakeholders and indeed has barely communicated at all. The Friends of the Scrubs have had no direct communication from the OPDC regarding plan revisions. The OPDC has not once since it's inception met with the Wormwood Scrubs Charitable Trust, a delegated committee of LBHF which is the sole trustee of Wormwood Scrubs. Secondly, the most recent set of documents produced seem designed to obscure what are real and substantive changes to the local plan rather than provide clarity.</p>	<p>No change proposed. OPDC officers have met with the Wormwood Scrubs Charitable Trust during the development of the Local Plan.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
83	Local Resident	Miriam	Shea		5		Places			P12	As far as I can tell given the difficulty of navigating the hodgepodge of documents which purport to be a coherent and barely altered local plan, various elements such as direct access to the scrubs from Old Oak which are no longer part of the plan remain in diagrams and maps as an alternative to the provision of green space within the development area;	No change proposed. In addition to the protection and enhancement of existing green space, the Local Plan requires new development to contribute towards 30% of the developable land outside of SIL to be delivered as publicly accessible open space. This includes the creation of two new Local Parks of a minimum 2 ha in size located at Channel Gate and Old Oak South. Connections are still proposed into Wormwood Scrubs in the Local Plan.	N	
83	Local Resident	Miriam	Shea		6		General	Delay or withdraw the plan			Giving the ever extending timeline for the opening of the HS2 station there is more than enough time available to do this properly. This local plan is deeply flawed and the OPDC has failed to follow proper process, in my opinion.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area. The proposed modifications are considered to be in general conformity with the 2021 London Plan and are considered to be legally compliant. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel. Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.	N	
84	Land owner	Blake	Gorst	Mirrorstoke Limited	1		Places			P10	I am writing to make a request that 151 Scrubs Lane be assessed as part of your re-visit to your Local Plan. I should be happy to consider a new proposal which re-provides the existing commercial floor space of 13,774 sq ft. A massing of 15 and 12 storeys is proposed so that the development does not take over any prominence over the proposals at nodal points such as Old Oak Common Station. The total number of homes proposed is in the region of 200 to 250 with tenure to be explored through the pre application process. Parking for the new homes would be based on 5% for Blue Badge holders. I look forward to meeting you in September to consider our proposals further and commence the pre-application process with our consultant team.	No change proposed. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. 151 Scrubs Lane (Site allocation 33) is identified for development. The site allocation remains unchanged from the Submission Local Plan. Table 3.1 identifies that site allocation housing capacities are minimums. Should a proposal seek to increase the housing capacity, this will be determined using relevant development plan policies and material considerations.	N	

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85	Land owner	Clara	Blagden	New Construct and LaSalle	1		Strategic Policies		SP10		<p>Site and Surroundings</p> <p>The Site to which these representations relate lies within the OPDC boundary and comprises a triangular shaped plot approximately 0.39 hectares in size. It currently comprises industrial units totalling 21,217 sq. ft (1,971 sq. m) GIA, with areas of hardstanding, 17 car parking spaces and a belt of mature trees runs along the western boundary.</p> <p>The Site is bound by Old Oak Common Lane which runs along the eastern site boundary, and the railway lines running parallel to the western and northern boundaries. To the east lies Wormwood Scrubs open space, which is a designated Metropolitan Open Land (MOL), industrial units lie to the west, beyond which lies a residential area.</p> <p>The Site is located within a highly sustainable area, and benefits from strong rail and road access into Central London and the surrounding area. It has a public transport accessibility level (PTAL) of 4. It also has the added benefits of being in immediate proximity of the location of the Old Oak Common Crossrail 2 Railways Station and across the road from Wormwood Scrubs, which is a key 'green lung' in this part of London.</p> <p>It is within Flood Zone 1, meaning it has the lowest risk of flooding. There are no heritage designations affecting the site.</p> <p>There are currently two leaseholders on the site, that have leases due to expire in 2029. However, there are break clauses in 2024, which means that both units can be available for redevelopment in the short-term.</p> <p>Whilst the redevelopment of the Site would be dependent on the planning process and an appropriate scheme being brought forward in policy and design terms, it is clear that the Site could be delivered in the short / medium term and the intention of these Representations is to promote the draft allocation to be in line with our clients' aspirations and to allow the redevelopment to come forward as quickly as possible.</p>	Noted.	N	
85	Land owner	Clara	Blagden	New Construct and LaSalle	2		Strategic Policies		SP10		<p>OPDC Local Plan Main Modification Consultation</p> <p>New Construct and LaSalle acknowledge that the new Local Plan will set out the vision and framework for how the OPDC area will develop over time, guiding growth in the area through planning policy for the next 20 years. Our clients are aware that the Plan has already undergone a significant amount of consultation in 2017 – 2018 when the Plan was first published and amended. It is understood that the Plan was examined in 2019 at Public Hearing, but that, whilst the majority of the Plan was deemed sound, its reliance on two unviable sites led to the Inspector's recommendation for modifications to the Plan before it could be adopted.</p> <p>New Construct and LaSalle support a number of key objectives within the emerging Local Plan and the proposed main modifications, including the requirement for high quality design; the provision of high-density mixed-use development within the new Old Oak major centre; and creating an area that will become a 'destination' for people that will be home to a mix of cultural and leisure uses.</p> <p>Our clients' strongly support the overall objectives of Policy P8: Old Oak Lane & Old Oak Common Lane and the principle of a residential-led mixed-use development on 'Site 25 - Old Oak Common Lane Sites'. However, it is considered the allocation could be more ambitious in terms of housing numbers, whilst providing a greater level of flexibility regard to the commercial/industrial floorspace. This is discussed in further detail below.</p>	Noted. Please refer to OPDC's response to New Construct and LaSalle detailed comments.	N	

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85	Land owner	Clara	Blagden	New Construct and LaSalle	3		Strategic Policies		SP10		<p>Place Policy P8: Old Oak Lane & Old Oak Common Lane</p> <p>The Site falls within the area designated under Place Policy 8: Old Oak Lane and Old Oak Common Lane, which sets a vision of delivering vibrant mixed-use neighbourhoods. The policy states that to enable this, proposals should plan positively to deliver the place vision by contributing and/or delivering where relevant, including:</p> <ul style="list-style-type: none"> • The delivery of 1,700 new jobs and a minimum of 2,750 new homes over the plan period. • The early delivery of a minimum of 1,200 homes that would contribute to the OPDC's 0 – 10 years housing supply. <p>Within the Policy P8 area, the Site is allocated as Site 25 'Old Oak Common Lane Sites'. Table 3.1 of emerging Plan sets out the requirements for the Site, as follows:</p> <ul style="list-style-type: none"> • A minimum of 200 residential units in the medium term (first 10 years of the Plan Period); • Minimum of 2,800 sq. m of commercial or industrial floorspace (over the Plan Period); • 180 new jobs as a result of commercial and industrial floorspace. 	Noted.	N	

85	Land owner	Clara	Blagden	New Construct and LaSalle	4	Strategic Policies	SP10	<p>Residential Floorspace New Construct and LaSalle strongly support the objectives of Policy P8 and the overall intentions for Site 25, to deliver a residential-led mixed-use scheme on the Site. However, there is scope for the minimum number residential units within the draft allocation to be increased from 200 to 350, which will assist OPDC and Greater London in meeting its housing targets.</p> <p>The new London Plan (2021) has increased the overall housing target for London to 52,287 homes per year over a ten-year period (up from 42,000 homes per year in the previous Plan). This is 14,000 homes per year below the objectively assessed annual housing need for London of 66,000 as identified in the GLA 2017 Housing Land Supply Assessment. Therefore, London Planning Authorities will remain under significant pressure to exceed the targets within the London Plan and opportunities to do so should not be missed.</p> <p>In relation to the Old Oak Park Royal Opportunity Area specifically, Table 2.1 of the London Plan identifies an indicative capacity of 25,500 new homes over the next 30 years. The emerging Local Plan sets out that at least 19,850 new homes can be delivered within the Local Plan period (2018-38), and that 13,670 new homes are deliverable within the London Plan 0–10-year period (2019-29). Policy H1 of the emerging Local Plan sets out that the delivery of 19,850 new homes during the Plan period within OPDC, will be partly achieved through:</p> <ul style="list-style-type: none"> • Supporting proposals that contribute to the delivery of a minimum annual housing target of 993 homes; • Supporting the delivery of 13,670 homes between 2019 and 2029, as set out within the London Plan; • Delivering a minimum of 18,900 homes on Site Allocations. <p>As highlighted within the emerging Local Plan, London is experiencing significant population growth and 'housing supply has not kept pace with increased demand'. The regeneration of Old Oak can play an important role in meeting both London wide and local housing need.</p> <p>As such, it is positive to see the emerging Local Plan states that OPDC will support proposals that help to optimise housing provision and contribute to the achievement of this annual average housing target. The indicative housing supply is anticipated to be 4,600 (0 to 5 years), 6,950 (6 to 10 years), 8,300 (11 to 20 years) and 6,150 (21 + years).</p> <p>However, indicative housing supply does not necessarily result in this amount of housing actually being delivered. Boroughs are assessed on actual housing delivery rather than targets and therefore, to enable London to meet its housing targets, it is essential that development plans identify an appropriate capacity for residential development on allocated sites, as well as encourage development on other appropriate windfall sites not identified in development plans. Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans and planning decisions. All of these points are clearly set out within Policy H1 of the London Plan.</p> <p>The emerging Local Plan also makes it clear that 'additional windfall housing may also increase the overall supply through a variety of sources' and that 'such development proposals will be supported where they are in accordance with the other Local Plan policies'.</p> <p>The proposed allocation for Site 25 sets out a minimum requirement for 200 residential units¹. However, our clients consider there is potential to increase housing numbers on the Site given the uncertainty of housing delivery over a long plan-period and to ensure that development potential is maximised.</p> <p>Our clients consider the Site has the potential to provide approximately 350 residential dwellings and therefore the emerging allocation currently at 200 units should be increased further. Increasing the numbers set out within the allocation will assist housing delivery within the borough, whilst also maximising the potential of the Site. Clearly any development is subject to a detailed design process as part of any pre-application discussions should a planning application come forward.</p> <p>The Site has the added benefits of the being very accessible for public transport and the location of Wormwood Scrubs adjacent providing a real asset to those living in any new development. The range of shops and other services further to the south on Old Oak Common Lane further demonstrates the site should be maximised to its greatest potential for residential.</p> <p>On the above basis, we would strongly encourage the proposed residential capacity of Site 25 to be increased from 200 units to a minimum of 350 residential units. This would better reflect the achievable number of dwellings on the Site identified by our</p>	<p>No change proposed.</p> <p>Housing capacities for sites are defined in the Development Capacity Study (DCS) Update based on the methodology set out in the DCS. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Table 3.1 identifies that site allocation housing capacities are minimums. Should a proposal seek to increase the housing capacity, this will be determined using relevant development plan policies and material considerations.</p>	N
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											clients. Naturally, this is clearly subject to strong design and appropriate consideration and justification of the surrounding townscape. An increase in housing numbers on the Site will ensure that development potential is maximised, assist OPDC and London in meeting its housing targets and protect the borough from having to revisit housing targets in the Plan period.			
85	Land owner	Clara	Blagden	New Construct and LaSalle	5		Strategic Policies		SP10		<p>Commercial Floorspace The principle of delivering commercial and/or industrial floorspace at the Site is supported by our clients, subject to operator demand as well as balancing the physical constraints of the Site. The London Plan makes it clear that London's population is set to grow from 8.9 million to around 10.8 million by 2041. As it does so, employment is expected to increase on average by 49,000 jobs each year, reaching 6.9 million over the same period. This rapid growth will bring many opportunities but will also lead to increasing and competing pressures on the use of space. The London Plan states that this will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities. Table 2.1 of the London Plan sets out the indicative capacity for new jobs at the Old Oak Opportunity Area is 65,000 jobs. London Plan policy E7 covers 'industrial intensification, co-location & substitution' and supports mixed use intensification of industrial sites as long as any redevelopment provides industrial, storage or distribution as part of such intensification. In addition, the industrial, storage or distribution floorspace must meet the criteria of point D of E7 by being truly functional and integral to the delivery of the wider co-location scheme. Therefore, the principle of co-location is supported by our clients and so the inclusion of commercial and/or industrial floorspace within the allocation is considered to be acceptable. However, currently the allocation is proposing a minimum of 2,800 sq. m, exceeding the quantum of existing commercial on the Site (1,917 sq. m). There should be no requirement for the allocation to provide additional commercial floorspace at the level in the draft allocation and thus it should be amended to reflect this by using the existing floorspace figure as the base position. The overall deliverability of the quantum of floorspace sought for the commercial operation also has to be considered against physical site characteristics and other works that are being undertaken in the area. As can be seen on Page 6 of the Feasibility Study, the Site has a small footprint and is an irregular, triangular shape, bound by Old Oak Common Lane which runs along the eastern site boundary, and the railway lines running parallel to the western and northern boundaries. Furthermore, Old Oak Lane will need upgrading (it is understood there are plans to lower the level of the road – a matter outside the control of New Construct / LaSalle) as it becomes one of the key routes into / out of the OPDC area, which may well impact access / egress to the site depending on the design of any upgrade. All these matters would need to be considered as part of the redevelopment of the site and quality solutions should not be restricted by arbitrary floorspace thresholds. It is clear that there are complexities in terms of the physical constraints of the Site which would impact the ability to deliver intensified industrial floorspace at site. Therefore, the allocation needs to adopt a flexible approach in regard to the quantum and type of commercial floorspace required on the Site, taking a site-specific approach in terms to design, and allowing for a wide range of commercial uses (e.g., Class E as well as industrial) if considered to be appropriate and viable. This will ensure that the scheme can reflect commercial demand, operator requirements, the physical constraints of the Site, as well as the technical constraints of delivering a co-location scheme.</p>	<p>No change proposed.</p> <p>The economic floorspace figures for this site allocation have not been amended as part of the proposed modifications and remain as they were at the point of submission.</p> <p>Economic floorspace capacities for sites are defined in the Development Capacity Study (DCS) Update based on the methodology set out in the DCS. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Table 3.1 identifies that site allocation commercial or industrial capacities are minimums. Should a proposal seek to amend this capacity, this will be determined using relevant development plan policies and material considerations.</p>	N	

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85	Land owner	Clara	Blagden	New Construct and LaSalle	6		Strategic Policies		SP10		<p>Deliverability</p> <p>New Construct and LaSalle are supportive of Table 3.1 of the new Local Plan, which identifies that the Site should deliver housing within the first 10 years of the plan period. Due to the site being previously developed land, it is important to note that subject to a detailed design process and positive pre-application discussions which support increased housing numbers on the site, our clients' ambition is for the site to come forward for development within the early stages of the plan period.</p> <p>As set out previously in this letter, the freeholder's ability to secure control of the Site is not impeded by any requirement for additional land ownership or the need to secure means of access or any other prohibitive matters, and thus the Site could be delivered in the short to medium term. It can therefore be considered to be a truly deliverable site.</p>	Noted. The Development Capacity Study Update identifies the site to be deliverable.	N	
85	Land owner	Clara	Blagden	New Construct and LaSalle	7		Strategic Policies		SP10		<p>Summary and Recommendations</p> <p>Our clients are supportive of the emerging Local Plan and the proposed Main Modifications, particularly in regard to objectives around growth, housing delivery and providing high quality design.</p> <p>The aspirations of Place Policy P8 are supported, with the aim of delivering a significant quantum of new jobs and new homes, contributing to OPDC's 0 – 10 years housing supply.</p>	Noted.	N	
85	Land owner	Clara	Blagden	New Construct and LaSalle	8		Strategic Policies		SP10		<p>The site allocation (Site 25) is not however ambitious enough in terms of quantum of residential that can be achieved on the Site. There is an opportunity to increase the quantum of residential floorspace beyond what is set out within the proposed allocation and therefore it should be amended to require a minimum of 350 residential units on the Site, subject to a quality design solution.</p>	<p>No change proposed.</p> <p>Housing capacities for sites are defined in the Development Capacity Study (DCS) Update based on the methodology set out in the DCS. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Table 3.1 identifies that site allocation housing capacities are minimums. Should a proposal seek to increase the housing capacity, this will be determined using relevant development plan policies and material considerations.</p>	N	
85	Land owner	Clara	Blagden	New Construct and LaSalle	9		Strategic Policies		SP10		<p>Furthermore, there is limited scope for the Site to intensify the industrial floorspace due to the physical constraints of the Site. Therefore, the allocation should be amended so that it requires re-provision of the existing quantum of floorspace only, allowing for a flexible approach to be adopted in regard to the types of commercial uses and taking a site-specific approach to design to determine the quantum which is viable.</p>	<p>No change proposed.</p> <p>The economic floorspace figures for this site allocation have not been amended as part of the proposed modifications and remain as they were at the point of submission.</p> <p>Economic floorspace capacities for sites are defined in the Development Capacity Study (DCS) Update based on the methodology set out in the DCS. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Table 3.1 identifies that site allocation commercial or industrial capacities are minimums. Should a proposal seek to amend this capacity, this will be determined using relevant development plan policies and material considerations.</p>	N	

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85	Land owner	Clara	Blagden	New Construct and LaSalle	10		Strategic Policies		SP10	Table 3.1	For the various reasons set out within this letter, our clients' request that the allocation for their Site is amended to the following (proposed changes in bold): Minimum net additional housing units over the first ten years of the plan period: 350 Indicative commercial or industrial floorspace over the plan period (sq. m): 1,971 New jobs resulting from the provision of commercial or industrial floorspace over plan period: 125	No change proposed. Please refer to OPDC's response to New Construct and LaSalle detailed comments.	N	
85	Land owner	Clara	Blagden	New Construct and LaSalle	11		General	General			Overall, the Site at 203 Old Oak Common Lane presents an excellent opportunity for the delivery of a residential-led mixed-use development at an underutilised site within the OPDC boundary in the short to medium term. Our clients are supportive of the emerging Local Plan and allocation for the Site, subject to the changes set out above. Addressing the comments set out within these representations are necessary to ensure that the site allocation reflects the commercial realities of viability and delivery by our client and maximises development potential.	Noted.	N	
86	Local Resident	Niall	O'Sullivan		1		General	General			As a young Londoner who has witnessed the positive results of redevelopment in areas such as Stratford and King's Cross I am in general supportive of development and am excited specifically about the possibility to see my local canal transformed into a vibrant mixed-use development which in general I feel would benefit me and my neighbours if this development were delivered successfully.	Noted.	N	
86	Local Resident	Niall	O'Sullivan		2		Strategic Policies		SP7		The risk of creating a dangerous no-go neighbourhood to the west of the development due to inadequate links out of the site at that side which will be fenced in to the north with no easy access to Harlesden station As someone born and raised in Brent I am extremely nervous about the risks of getting this wrong and creating a dangerous neighbourhood and no-go zone. Specifically I feel that the lack of easy access at the western edge of the site to Harlesden station (which was acknowledged during the Channel Gate consultation on June 10) and fenced off to the north and south by the freight terminal and canal respectively will essentially make this a dangerous no-go zone with high levels of crime and social deprivation. This area, specifically Harlesden and Wembley, has a long history of such developments and I believe that the proposed access to the site is not adequate to create a healthy flow of people through the area which increases the risk of crime. This is for me a major consideration that I am sure would have formed part of the full consultation had the Channel Gate site been identified for major residential development at the outset as opposed to the very end of the process.	No change proposed. The Local Plan has various policies and proposal to ensure the OPDC area is well connected to Harlesden. The Infrastructure Delivery Plan proposes improvements to Acton Lane to better connect Harlesden station to the OPDC area. A bus strategy also supports improvements in bus connections between OPDC and Harlesden. Proposals for Willesden Junction station include improved linkages from the station to Harlesden Town Centre. Policy requirements for designing out crime are included within Policies D2 and D4.	N	

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86	Local Resident	Niall	O'Sullivan		3		General	Extent of changes			<p>Overall the process by which we have been consulted on the pivot from the Car Giant to the Channel Gate site at the last minute has not been adequate for what is a major residential development that appears to be contrary to the ideal approach preferred by OPDC at the outset of the process, i.e. to develop the Car Giant site for housing to minimize impact on local residents in what is a much more suitable site.</p> <p>I think the OPDC team did an excellent job engaging local communities about the modifications however I object to the OPDC's Modified Local Plan as I feel it is not justifiable to describe the major changes to the proposed use of the Channel Gate site at the last minute as a "modification" and do not feel that my community was consulted adequately on. My feeling having reviewed all of the developments is that a difficult decision has been made to repurpose the Channel Gate site at the last minute for a major 3,100-home development. My interpretation of the consultation is that having identified with some justification the Car Giant site as the most suitable site for major housing development to minimize impacts on the local community since 2018 at the outset of the process, at the very last minute it has been necessary to pivot away from the site to the only remaining option which is Channel Gate.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	

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86	Local Resident	Niall	O'Sullivan		4		General	Extent of changes			<p>Many in my community in the Island Triangle feel that the modified local plan's idea of using Channel Gate / Willesden Euroterminal Yard for high density high rise – which will dominate and degrade the existing low rise residential areas - has been inadequately consulted on and should not be introduced as a 'modification' at this late stage of the plan's development. Because face to face meetings were not possible in the pandemic and by offering limited online sessions, the OPDC has in effect kept such a radical change to its plan – moving housing from the Car Giant site to new sites by existing homes – hidden from local people.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
87	Local Resident	Nick	McNulty		1		General	Extent of changes			<p>I am writing to object to the latest modifications to your Local Plan for this area. My name is Nicholas McNulty and I am a local resident in W10, living close to Scrubs Lane.</p> <p>My main points of opposition to the Modified Local Plan are as follows:</p> <p>Many of the 'modifications' to the Draft Local Plan are significant changes. We were not fully informed of these in the consultation letter you sent out in May of this year. That letter was misleading as the modifications proposes changes that will affect the local communities lives in a dramatic way. The consultation you have run is therefore inadequate.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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87	Local Resident	Nick	McNulty		2		Places		P10C5		In particular, the proposals for a fifth 'cluster' at North Pole Depot with more tall buildings did not feature in the 2018 OPDC Draft Local Plan and cannot be treated as a minor modification.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p>	N	

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87	Local Resident	Nick	McNulty		3	MM/PS2/OPDC/P10C5/1	Places		P10C5		<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. This modification will destroy the views from our local open spaces - Wormwood Scrubs and Little Wormwood Scrubs. These skylines are part of the very essence of this 'common land' and are vital for our local communities, many of whom live in large housing estates in one of the most densely populated and deprived areas of the country.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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87	Local Resident	Nick	McNulty		4	MM/PS2/OPDC/P2/1	Places		P10		<p>The lack of transport of improved road systems undermines the proposals for the proposed new developments. With no new overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
87	Local Resident	Nick	McNulty		5		Places		P1		<p>There is no vehicle access from Scrubs Lane to the eastern end of the new Old Oak station. Without improvements, traffic issues will get worse. Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane sees longer queues every year. Why is a new Local Plan not dealing with this issue?</p>	<p>No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in it's own right, similar to Kings Cross. OPDC's aspirations for Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. From the eastern entrance, there will be a pedestrian/ cycle bridge connecting the station to the Grand Union Canal where journeys can continue by foot or bike to Scrubs Lane. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area. The station has been designed with the western entrance being the main station entrance, meeting all health and safety, including fire, regulations.</p>	N	

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87	Local Resident	Nick	McNulty		6		General	Delay or withdraw the plan			<p>The Modified Local Plan highlights how out of date the Local Plan has become. There is little evidence that there is an appetite for high-density living, following Grenfell, Covid and social trends. Now is the time to step back and review the plan, not force through significant changes under the guise of 'modifications'. Make it a plan that reflects our future rather than one that becomes an empty symbol of the past.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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88	Local Resident	Nicky	Davies Williams		1		Places		P10		<p>I am writing as an increasingly concerned citizen of North Kensington who has followed the ever changing development plans for this above site, that continue to ignore the lack of available road or rail infrastructure to support such a development. This risks a very poorly served but densely occupied site that is likely to breed frustration and discontent for all residents of the the proposed site as well as those in the surrounds.. There is no new overground at Hythe Lane, and traffic on Scrubbs Lane is already over congested and frequently gridlocked. It seems that no part of the plan thinks ahead to the political implications of managing such a high density site with inadequate ability to reach work or schools or other necessities. I would be grateful for a review on this basis.</p>	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p> <p>A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p>	N	

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88	Local Resident	Nicky	Davies Williams		2		Strategic Policies		SP9		<p>In addition, North Kensington is an area scarred by the Grenfell fire and there is little appetite for further high rise living in the area or in general, in addition the general population is concerned following the cladding housing scandals of the past few years.</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	

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88	Local Resident	Nicky	Davies Williams		3	MM/PS2/OPDC/P10C5/1	Places		P10C5		<p>Wormwood Scrubs and Little Wormwood Scrubs have been a lifeline for the mental health of the area and should be protected and cherished as vital to the necessity for youth sports and recreation as well and the health and well-being of others. Modification MM/PS2/OPDC/P10C5/1 proposes to overload all systems, and give no sense of the space and open air that this space currently provided, but create an over populated and less safe environment for all.</p>	<p>No change proposed. The Local Plan continues to protect Wormwood Scrubs as Metropolitan Open Land and an area of ecological importance and supports sensitive enhancements to both its ecology and leisure functions.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	
88	Local Resident	Nicky	Davies Williams		4		General	Support for community group comments			<p>For these reasons I fully support the Woodlands and St Quentin Neighbourhood trust views that have been presented to you.</p>	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.</p>	N	

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89	Local Resident	Nicola	Easton		1		General	General			I am writing in response to the above plan in my capacity as a Hammersmith and Fulham resident who is also a frequent visitor to Wormwood Scrubs open space. I've lived in this area for over 25 years. I am a trustee/committee member of Friends of Wormwood Scrubs and this is my personal response to the plan. I know The Friends and many other individual neighbours are making their own representations, so I am focussing on a limited number of objections.	Noted.	N	
89	Local Resident	Nicola	Easton		2		Places		P12		<p>1. The exploitation of Wormwood Scrubs beyond what it can sustain. The plan as a whole has totally insufficient provision for open, green recreational space for so many new residents and workers, so they will have few choices other than to go to Wormwood Scrubs. Yet the OPDC seems to have made no provision whatsoever for protecting the fragile natural habitat of Wormwood Scrubs from such massively increased footfall. Wormwood Scrubs as a natural habitat will suffer terribly yet - just one example - the plan actually refers to "vegetation" as an obstacle to be cleared away to enable cyclists and walkers travelling from the north to "access" the Scrubs more easily! Presumably this means cutting down more woodland, just after HS2 have cut down a lot already?</p> <p>How is destroying vegetation in order to save some cyclists the trouble of cycling a few yards further down Scrubs Lane helping the already severely stressed species clinging to existence on Wormwood Scrubs?</p> <p>The impression is given that underlying this kind of suggestion, and the plans for Wormwood Scrubs in general, is a powerful desire to exploit the green space as much as possible, using its presence to liberate developers from the obligation to allow for recreational space in their own plans and thus to cram in more buildings. The Scrubs as we know it will wither as a biodiverse habitat for birds and other species.</p>	<p>No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site.</p> <p>Policy P12 protects Wormwood Scrubs as Metropolitan Open Land and as an area of ecological value. Any proposals involving impacts on areas of ecological value would need to reprovide a net gain in biodiversity in accordance with Policy EU2. Both Policy P12 and EU2 remain largely unaltered since the submission of the Local Plan.</p> <p>Providing improved access to Wormwood Scrubs is justified to support it's role as a Metropolitan Park serving the wider West London area, and it's role as set out in the Wormwood Scrubs Act. Any proposals for such improvements would need to be undertaken in agreement with the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust.</p>	N	
89	Local Resident	Nicola	Easton		3		Spatial Vision				<p>2. The lack of awareness of needs post-pandemic I feel the spirit of the plan is entirely pre-pandemic, lacking forethought as to what London and Londoners need, and what nature needs post-pandemic.</p> <p>A bolder vision could have included a new rewilding project, for example, perhaps contiguous to the Scrubs - and far more green space.</p> <p>A bolder vision would have included lower density housing with more scope for communal gardens in which residents can do their own gardening, instead of being limited to the occasional balcony tomato plant.</p> <p>A bolder vision would have recognised that nature and the natural world needs to be protected, not merely exploited.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that is an exemplar in healthy and sustainable large-scale development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity. Policy D5 requires development to deliver private and communal open space in accordance with Mayoral guidance and requires development to provide space for food growing.</p>	N	

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89	Local Resident	Nicola	Easton		4		Design		D4		<p>3. Lack of awareness of the impact of tall buildings As the plan stands, the many tall buildings around the area will block out sunlight and rain for most of the day and create dark, arid wind tunnels (for example, at Old Oak Gardens and Stamford Gardens). The proposed small green spaces in their vicinity will be of limited biodiversity, inaccessible and inhospitable to species and suffering heavy human footfall. Tall buildings also create a boxed-in, claustrophobic feeling on the Scrubs similar to that at Central Park in New York, which I would hold up as a perfect example of what we do NOT want the Scrubs to look like.</p>	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The Scrubs Lane Development Framework Principles is supported by an updated Scrubs Lane Strategic Views Assessment that assessed the proposed modifications to policy P10 buildings heights guidance in relation to the impact on heritage assets and townscape. The updated outcome of the assessment has not changed.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
89	Local Resident	Nicola	Easton		5		Strategic Policies		SP8		<p>4. Unrealistic and/or vague attitude to nature In the different sections of the plan, there are references to "enhancing" green spaces and even to "relocating" nature reserves such as Birchwood Nature Reserve. It is not clear what "enhancing" means. Relocation of a nature reserve is not a realistic aim if the preservation of nature is required - a habitat cannot be simply "relocated" and planting saplings in another place is not the same thing.</p>	<p>No change proposed. The purpose of SP8 is to ensure that development protects and enhances green and public space and ensuring that if there is any loss, there is re-provision to an equal or better quantum and quality. The meaning of enhancement is to improve areas of ecological value.</p>	N	
89	Local Resident	Nicola	Easton		6		Environment and Utilities		EU1		<p>There are unintelligible references to "integrating green spaces" (what does this mean?), to "providing access to nature" with scant reference to how nature is to be protected from our access to it. The images used to give us an idea of what the area will look like feature bleak concrete pavements and the astroturf steps at Kings Cross Granary Square - astroturf is probably one of the most significantly malevolent attacks on the natural world around in London today - it smothers the earth, leaves plastic residue and confuses birds who waste valuable energy landing on it and trying to find food.</p>	<p>No change proposed.</p> <p>The regeneration of the OPDC area will be underpinned by a comprehensive network of green infrastructure, which will need to serve the needs of both people and nature.</p> <p>As required by Policy EU2, all proposals will need to ensure at least a net gain in biodiversity and proposals for new public open spaces will need to be accompanied by a management plan setting out how of areas of biodiversity will be maintained and managed in the longer term.</p> <p>Proposals will also be required to undertake an Urban Greening Factor (UGF) assessment in order to optimise urban greening within development.</p>	N	

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89	Local Resident	Nicola	Easton		7		General	Delay or withdraw the plan			I cannot see why this plan has to be accepted in its present form. There should be no rush and it should be completely reconsidered. If the pandemic has taught us anything it is that our relationship with nature should be rethought.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
90	Local Resident	Nigel	Brockmann		1		General	Support for community group comments			I fully support the support the views of the St Quintin and Woodlands Neighbourhood Forum, namely:	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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90	Local Resident	Nigel	Brockmann		2		General	Extent of changes			The consultation letter sent to households in May was inadequate and misleading. This said 'much of our draft Local plan hasn't changed'. But there are big changes affecting where we live.	<p>No change proposed. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>The majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p>	N	
90	Local Resident	Nigel	Brockmann		3		Places		P10		A new station at Old Oak Common will do little to improve our public transport options. With no vehicle access from Scrubs Lane to the eastern end of the station, how do we get there by bus or taxi, or be dropped off by car?	No change proposed. The Bus Strategy sets out the approach for servicing Old Oak Common Station, which includes several bus routes to the east - bus routes 7, 220 and 487. Taxis and drop off location has not changed and is accessible to the wider road network, including from the east of the site, from Old Oak Common Lane.	N	

90	Local Resident	Nigel Brockmann	4	MMPS2/OPDC/P10C5/1	Places	P10C5	<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. More residential towers are also planned for Scrubs Lane. How were we meant to hear about these latest plans? They will destroy the views from our local open spaces.</p>	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility, access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and 	N
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												<p>Get West London.</p> <ul style="list-style-type: none"> • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		

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90	Local Resident	Nigel	Brockmann		5		Places		P10		<p>Not one of the four tower blocks already approved by OPDC along Scrubs Lane since 2017 has been built. This is the wrong location for high density living. Why will people want to live there rather than at the new developments at White City? Extra buses will do little to improve access to public transport. Why will new shops and cafes start up in a street which goes through an industrial area?</p>	<p>No change proposed.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. The phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>3 tall buildings have been approved by OPDC since its inception on Scrubs Lane. One of these is now under construction with one shortly to be under construction.</p>	N	

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90	Local Resident	Nigel	Brockmann		6	MM/PS2/OPDC/P2/1	Places		P10		With no new Overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The main changes in housing capacity on Scrubs Lane during the Local Plan period are as a result of North Pole Depot East site being brought forward so that it is now being delivered within the Local Plan period and accounting for new planning permissions.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
90	Local Resident	Nigel	Brockmann		7		Strategic Policies		SP7		High density housing which is 'car-free' does not mean 'vehicle free'. This Plan takes no account of the growth of Uber and delivery vehicles.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.	N	
90	Local Resident	Nigel	Brockmann		8		Places		P10		Nothing seems to be planned as additions or changes to the local road network. Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane sees longer queues every year. Why is a new Local Plan not dealing with this issue?	Noted. The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.	N	

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90	Local Resident	Nigel	Brockmann		9		Strategic Policies		SP9		High rise housing is not what many people want or need in 2021, We have had Grenfell, lockdown living with queues for lifts, and a cladding scandal. We do not need a repeat version of North Acton in North Kensington.	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	
90	Local Resident	Nigel	Brockmann		10		General	Delay or withdraw the plan			Rather than a 'modified' version of a Plan that has got worse rather than better since 2018, why not start afresh? Old Oak Common Station will not be open for 8-12 years yet. There is time to plan for a new part of London that will look to the future of the city, rather than a plan put together in 2018..	<p>No change proposed. OPDC considers the modified Local Plan to be sound effective and deliverable. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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91	Local Resident	Nye	Jones		1		Strategic Policies		SP6		I object to the OPDC's Modified Local Plan for the following reasons: 1. The OPDC's 2021 Draft Local Plan wants the Channel Gate site for 'major town centre uses' with high density and high rise buildings, which is wrong and an overdevelopment of this area. Having high rise buildings at Channel Gate will have nothing in common with the high rise blocks at North Acton - it is ridiculous to say in a planning document that they are part of a 'town centre' - there are entirely separate.	No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.	N	
91	Local Resident	Nye	Jones		2		Places		P9		Any high rise and large buildings built on the eastern side of Channel Gate area / Willesden Euroterminal Yard) will dominate the low rise Old Oak Lane residential area (island triangle residential area) and undermine its attractive setting.	No change proposed. Policy P9 places a strong emphasises on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.	N	
91	Local Resident	Nye	Jones		3		Places		P9		In addition, the Channel Gate area only has only one access road which joins Old Oak Lane, so traffic on the A4000 will get worse. This is not careful strategic development - it is the OPDC making a tactical switch after failing to develop the Car Giant site; the amount of development proposed for Channel Gate is not sustainable.	No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel. The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site. The Local Plan's transport chapter includes a series of planning policies which seek to promote the use of sustainable travel modes, minimise car parking levels and minimise the impacts of development on the highway network during construction.	N	
91	Local Resident	Nye	Jones		4		General	Extent of changes			2. The modified local plan's idea of using Channel Gate / Willesden Euroterminal Yard for high density high rise – which will dominate and degrade the existing low rise residential areas - has been inadequately consulted on and should not be introduced as a 'modification' at this late stage of the plan's development. Because face to face meetings were not possible in the pandemic and by offering limited online sessions, the OPDC has in effect kept such a radical change to its plan – moving housing from the Car Giant site to new sites by existing homes – hidden from local people.	No change proposed. Policy P9 places a strong emphasis on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement.	N	

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91	Local Resident	Nye	Jones		5		Strategic Policies		SP9		<p>3. The OPDC's assumptions through the draft plan that high rise housing is what many people want in the future is very questionable because the issue of making high rise buildings' exterior cladding safe still hasn't been resolved four years after the Grenfell disaster. Local people in Old Oak who have visited the redeveloped Stonebridge Park estate one mile to the North, can see that 4-5 storey developments have created more attractive and sustainable communities than is being proposed for Channel Gate Road and the expansion of North Acton.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	
91	Local Resident	Nye	Jones		6		Strategic Policies		SP6		<p>4. In its draft plan, OPDC claims that these new proposed housing locations will be "well connected" but the idea for the new Overground stations for Old Oak has been dropped, so these locations will not have adequate public transport and will add to the traffic problems and overcrowded Tube trains that this community was seeing, even before HS2 started its construction work. 15 Stephenson Street. Nw10 6tx</p>	<p>No change proposed.</p> <p>The Local Plan proposes a state of the art transport network which will make the OPDC area one of the best connected places in London and the UK.</p> <p>Old Oak Common Station will be key to this transformation, with construction of the station formally beginning in summer 2021. The station will offer fast and frequent connections nationally via HS2 and the Great Western Main Line, and regionally and locally across London via the Elizabeth Line.</p> <p>Upgrades to Willesden Junction Station and North Acton, and a potential new London Overground station at Old Oak Common Lane will further supplement this connectivity across London.</p> <p>The previously proposed overground station at Hythe Road is no longer being proposed due the retention of SIL within Old Oak North.</p> <p>These key rail projects will be underpinned by new and enhanced connections across the area, including the new Old Oak Street and Channel Gate Street, and enhanced Scrubs Lane, Victoria Road, Old Oak Lane, and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area.</p>	N	

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92	Local Resident	Oliver	Carricart		1		Strategic Policies		SP6		My name is Olivier Carricart and I object to the OPDC's Modified Local Plan for the following reasons: 1. The OPDC's 2021 Draft Local Plan wants the Channel Gate site for 'major town centre uses' with high density and high rise buildings, which is wrong and an overdevelopment of this area. Having high rise buildings at Channel Gate will have nothing in common with the high rise blocks at North Acton - it is ridiculous to say in a planning document that they are part of a 'town centre' - there are entirely separate.	No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.	N	
92	Local Resident	Oliver	Carricart		2		Places		P9		Any high rise and large buildings built on the eastern side of Channel Gate area / Willesden Euroterminal Yard) will dominate the low rise Old Oak Lane residential area (island triangle residential area) and undermine its attractive setting.	No change proposed. Policy P9 places a strong emphasises on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the area's heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.	N	
92	Local Resident	Oliver	Carricart		3		Places		P9		In addition, the Channel Gate area only has only one access road which joins Old Oak Lane, so traffic on the A4000 will get worse. This is not careful strategic development - it is the OPDC making a tactical switch after failing to develop the Car Giant site; the amount of development proposed for Channel Gate is not sustainable.	No change proposed. The principles for improving connections to the site remain consistent as they would have been for an intensified industrial location. Mixed use development of Channel Gate will result in a new movement network across the site which will prioritise sustainable and active modes of travel. The core part of this movement network will be a new Channel Gate street, a new all modes street connecting the north and south of the site, including a new crossing of the canal, with new/enhanced access to Old Oak Lane in the north and Victoria Road/Old Oak Common Lane in the south. This will be supported by a network a secondary streets and access to the site. The Local Plan's transport chapter includes a series of planning policies which seek to promote the use of sustainable travel modes, minimise car parking levels and minimise the impacts of development on the highway network during construction.	N	
92	Local Resident	Oliver	Carricart		4		General	Extent of changes			2. The modified local plan's idea of using Channel Gate / Willesden Euroterminal Yard for high density high rise – which will dominate and degrade the existing low rise residential areas - has been inadequately consulted on and should not be introduced as a 'modification' at this late stage of the plan's development. Because face to face meetings were not possible in the pandemic and by offering limited online sessions, the OPDC has in effect kept such a radical change to its plan – moving housing from the Car Giant site to new sites by existing homes – hidden from local people.	No change proposed. Policy P9 places a strong emphasis on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage. Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement.	N	

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92	Local Resident	Oliver	Carricart		5		Strategic Policies		SP9		<p>3. The OPDC's assumptions through the draft plan that high rise housing is what many people want in the future is very questionable because the issue of making high rise buildings' exterior cladding safe still hasn't been resolved four years after the Grenfell disaster. Local people in Old Oak who have visited the redeveloped Stonebridge Park estate one mile to the North, can see that 4-5 storey developments have created more attractive and sustainable communities than is being proposed for Channel Gate Road and the expansion of North Acton.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	
92	Local Resident	Oliver	Carricart		6		Strategic Policies		SP6		<p>4. In its draft plan, OPDC claims that these new proposed housing locations will be "well connected" but the idea for the new Overground stations for Old Oak has been dropped, so these locations will not have adequate public transport and will add to the traffic problems and overcrowded Tube trains that this community was seeing, even before HS2 started its construction work. 15 Stephenson Street. Nw10 6tx</p>	<p>No change proposed.</p> <p>The Local Plan proposes a state of the art transport network which will make the OPDC area one of the best connected places in London and the UK.</p> <p>Old Oak Common Station will be key to this transformation, with construction of the station formally beginning in summer 2021. The station will offer fast and frequent connections nationally via HS2 and the Great Western Main Line, and regionally and locally across London via the Elizabeth Line.</p> <p>Upgrades to Willesden Junction Station and North Acton, and a potential new London Overground station at Old Oak Common Lane will further supplement this connectivity across London.</p> <p>The previously proposed overground station at Hythe Road is no longer being proposed due the retention of SIL within Old Oak North. The potential Old Oak Common Lane station remains in the Local Plan, is safeguarded for and its delivery is strongly supported given its important strategic case.</p> <p>These key rail projects will be underpinned by new and enhanced connections across the area, including the new Old Oak Street and Channel Gate Street, and enhanced Scrubs Lane, Victoria Road, Old Oak Lane, and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area.</p>	N	

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93	Politician	Onkar	Sahota AM		1		General	General			As the local London Assembly Member for Ealing and Hillingdon, I welcome this opportunity to respond to the OPDC's Post Submission Modified Draft Local Plan.	Noted.	N	
93	Politician	Onkar	Sahota AM		2		Strategic Policies		SP4		<p>Firstly, whilst I fully appreciate that 20,100 to 19,850 is only a small drop in the overall amount of affordable housing, the potential loss of affordable homes as a result of this reduction is still a concern. I would like to see steps taken to mitigate this loss, such as a concrete number which is baked into the plan, rather than an overall percentage, considering the desperate need for affordable housing in London. The OPDC has the potential to alleviate part of that need and it is vital we do not waste this opportunity.</p>	<p>No change proposed. Delivering affordable housing is a priority for OPDC and key requirement of the Local Plan. The decreased housing delivery figures relate to all housing tenures. OPDC's affordable housing policies remain unchanged and will continue to seek to deliver the overarching target for 50% affordable housing.</p> <p>With the revised site allocations OPDC can still meet the 2021 London Plan target of 13,670 homes between 2019 and 2029 and the overall 25,500 home indicative target over the lifetime of the development. The slight reduction in homes anticipated within the Plan period may also be made up with windfall development. Site capacities within site allocations are also expressed as minimum figures which could be exceeded subject to other planning policy considerations being appropriately satisfied. OPDC therefore considers that there a number of ways in which housing needs, particularly those for affordable housing, can be met within the Local Plan period without the need for a fixed affordable homes target, which in may not be viably possible to achieve if applied on a site by site basis where all development costs are not yet known.</p>	N	
93	Politician	Onkar	Sahota AM		3		Strategic Policies		SP7		<p>Secondly, I would be keen to know what analysis has been done on the impact on traffic due to the loss of one of the Overground stations, which is being outlined in the modified local plan? The loss of a station at Hythe Road is a concern – there is worry from residents that this will mean more people driving over to other stations such as the Old Oak Common Lane station and a wider concern about the impact of this loss on the overall use of cars. Are you able to tell me what is being done to ensure adequate bus routes are in place to ensure that residents have alternatives to driving?</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station. The Local Plan continues to require strict car parking policies to limit the use of private vehicles. The Old Oak Common Lane Overground station would be well served by walking and cycling routes and buses to avoid the need for people to travel to it by private cars and the station would not be accompanied by any car parking. A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
93	Politician	Onkar	Sahota AM		4		Strategic Policies		SP7		<p>I am also concerned that the opening date of HS2 has been pushed back from 2026 to 2028. Whilst I have a great deal of sympathy for the complex logistics around HS2, the completion of this project remains incredibly important for residents of the OPDC; access and use of the station is important but I am also concerned about the impact of prolonged large scale construction and its effects on the wellbeing of residents who move into the area before construction finishes. I am deeply concerned, therefore, about this further delay.</p>	<p>No change proposed. The delayed opening of the Old Oak Common station was a decision made by national government, not as a consequence of OPDC's Local Plan. However, OPDC will continue to work closely with HS2 to ensure that Old Oak Common station is delivered as soon as possible.</p>	N	
93	Politician	Onkar	Sahota AM		5		General	General			Thank you for your time and the opportunity to feed into these changes.	Noted.	N	
94	Local Resident	Oonagh	Heron		1		General	General			long-standing resident of the 'Island Triangle' next to Channel Gate Road, I object to the OPDC's Modified Local Plan	Noted.	N	

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94	Local Resident	Oonagh	Heron		2		Places		P9		I do not agree that most of the plan is the same as the 2018 draft plan, not least because the Channel Gate Road site for residential use was not part of that plan (MM/PS2/OPDC/P9/1).	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Channel Gate had been allocated in the previous draft of the Local Plan for high density industrial uses.</p> <p>Policy P9 places a strong emphasis on the importance of the Old Oak Lane conservation area. Proposals are required to strengthen local identity and character by conserving and enhancing the conservation area and its setting, and to ensure that the character of future development is informed by the areas heritage.</p> <p>Policy P9 (o) requires that lower building heights and appropriate massing are delivered adjacent to the conservation area.</p>	N	
94	Local Resident	Oonagh	Heron		3		Places		P9		This number of residents will further strain the already creaking road infrastructure. Every car journey currently takes at least three times as long as before since the HS2 work started. Coming home from Asda and Central Middlesex Hospital now takes 30-40 minutes in traffic jams and bizarre diversions and the zebra crossing by Channel Gate Road has all but vanished due to the amount of traffic going over it. Even if the Euroterminal Yard home discouraged car ownership, we would have hugely increased traffic from deliveries and it's already hard to get on Overground trains at Willesden Junction (pre pandemic), not to mention that the Old Oak station has been dropped MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1.	No change proposed. The Local Plan sets out a range of policies and proposals to address the transport challenges of the OPDC area. This includes an Infrastructure Delivery Plan to upgrade existing roads and junctions and provide new routes to promote walking and cycling; a bus strategy to ensure a comprehensive bus network across the area; new stations servicing new rail lines and upgrades to existing stations; and restrictive parking policies to discourage private vehicle use and policies that reduce trips from construction and servicing and delivery. Issues with current road closures associated with the construction of HS2 are outside of the scope of the Local Plan.	N	
94	Local Resident	Oonagh	Heron		4		Places		P9		I have watched the growth of the towers down at North Acton and note that there are commercial units at the base of the towers that have never succeeded having tenants, which reduces the credibility of the idea of the Channel Gate Road/Euroterminal development being part of 'major town centre uses'. Really not sure pizza delivery outlets constitute a town centre.	<p>No change proposed. North Acton is a separate neighbourhood town centre. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p>	N	

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95	Land owner	Neil	Rowley	Osbourne Investments Ltd and Quattro Holdings Ltd	1		General	General			<p>Site Context</p> <p>Our clients own land comprising Boden House, the former waste site to the rear of Boden House and the Boarshead (former John Lewis carpet storage unit) forming part of the 'shield' site.</p> <p>Generally we support the aims and vision of the OPDC and the regeneration of Park Royal. We support the increase in the proposed numbers of homes and jobs set out in SP4 and SP5 (and the consequential follow through of such increases into other policies). We also support the co-ordinated approach to place making set out in SP6. Our comments on various policies are set out below.</p>	Noted.	N	
95	Land owner	Neil	Rowley	Osbourne Investments Ltd and Quattro Holdings Ltd	2		Strategic Policies		SP10	Table 3.1	<p>Table 3.1 Site Allocations</p> <p>We remain of the view that the suggested numbers for Boden House are potentially a little low given the potential site. However, when combined with the suggested numbers for Acton Wells East (the 'shield site') then a more realistic figure is achieved. We welcome the increase in homes proposed for Acton Wells East (site 11), which better reflect the opportunity at this location.</p>	Noted.	N	

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95	Land owner	Neil	Rowley	Osbourne Investments Ltd and Quattro Holdings Ltd	3	MM/PS2/OPDC/P7/7	Places		P7	Paragraph 4.108	<p>Infrastructure</p> <p>We consider that the reference to safeguarding the Quattro site should be removed. The waste uses on the 'Quattro' site have been removed and relocated elsewhere. They are now in place and active at Horn Lane in Ealing. Accordingly there is no need to safeguard the Acton Wells site as it has already been replaced. The reference should be removed from the Local Plan because (particularly given the lifespan of the plan) there could be uncertainty over the need for relocation.</p> <p>In reality, the relocation has extinguished the waste business at Acton Wells because waste use is very localised and users will now have relocated to other operations.</p> <p>Accordingly point o) should be removed from Policy P7. Paragraph 4.108 MM/PS2/OPDC/P7/7 should read as follows: <i>The waste site ceased operation in November 2018 and compensatory provision has been found elsewhere.</i> We will take these issues up with the North London Waste Plan when it is next revised.</p>	<p>No change proposed. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. The Quattro site has been identified as a site allocation in the WLWP since it was adopted in 2015 and with the acknowledgement that the site was subject to HS2 Safeguarding Direction and would not be available from 2017 until 2024. Paragraph 6.70 (MM/PS2/OPDC/EU6/1) states that OPDC will work with the host boroughs and other waste planning authorities covered by the WLWP to adopt a new WLWP. If a proposal for a non waste use came forward then this will be assessed against relevant national, 2021 London Plan and Local Plan policies, including the requirement for compensatory provision.</p> <p>Outside the Local Plan process, OPDC would welcome further discussions regarding the relocation to inform future evidence base.</p>	N	
95	Land owner	Neil	Rowley	Osbourne Investments Ltd and Quattro Holdings Ltd	4		Places		P7	Figure 4.21	<p>Acton Wells Square</p> <p>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.</p> <p>We have no objection on this matter provided ODPC confirms that the size and location of Acton Wells Square is indicative.</p>	<p>No change proposed. The location of the square is indicative as confirmed by paragraph 1.25 of the Local Plan.</p> <p>Policy SP8 requiring the delivery of 30% of development to be public open space and policy SP10 requiring development to be optimised will be relevant alongside policy P7.</p>	N	

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95	Land owner	Neil	Rowley	Osbourne Investments Ltd and Quattro Holdings Ltd	5		Strategic Policies		SP9		<p>Building Heights (Generally)</p> <p>We welcome the policy approach to Tall Buildings and the identification of Acton Wells as a suitable location for Tall Buildings.</p> <p>We do believe there is a real opportunity to provide Tall Buildings within the OPDC area. We are perhaps a little disappointed that the Tall Buildings Strategy is not a little more positive about the potential height of buildings. We have previously carried out masterplanning work with Farrells on Boden House and the Shield Site that suggests that buildings of 30-40 storeys in height might be appropriate (subject to detailed design). We would have preferred to see the Tall Buildings Strategy be more positive about building heights in this type of range.</p>	<p>No change proposed. OPDC's Tall Building Statement Update continues to identify a tall building as above 15 storeys or above a minimum of 48 metres above ground level. This is based on methodology set out in the Tall Building Statement and is not proposed for modification. The Local Plan does not define building heights for tall buildings. Appropriate heights will be defined through the development management process.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
95	Land owner	Neil	Rowley	Osbourne Investments Ltd and Quattro Holdings Ltd	6		General	General			<p>Summary</p> <p>The Boden House site and its surrounding sites are 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.</p> <p>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.</p>	Noted.	N	
96	Land owner	Neil	Rowley	Park Score Ltd	1		Places		P9		<p>Site Context</p> <p>Park Score Ltd owns the RATP Park Royal Bus Depot.</p> <p>Generally we support the aims and vision of the OPDC and the regeneration of Park Royal. We support the mixed use redevelopment of Channel Gate (Policy P9). We support the increase in the proposed numbers of homes and jobs set out in SP4 and SP5 (and the consequential follow through of such increases into other policies). We also support the co-ordinated approach to place making set out in SP6. Our comments on various policies are set out below.</p>	Noted.	N	

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96	Land owner	Neil	Rowley	Park Score Ltd	2		Strategic Policies		SP10	Table 3.1	Table 3.1 Site Allocations We welcome the inclusion of Channel Gate (P9 site 26) and the suggested numbers of homes and jobs.	Noted.	N	
96	Land owner	Neil	Rowley	Park Score Ltd	3		Places		P9		Policy P9 Channel Gate We welcome the vision for Channel Gate. We support the key land use requirements (note our comment on the Channel Gate Park below).	Noted.	N	
96	Land owner	Neil	Rowley	Park Score Ltd	4		Places		P9		Building Heights We support the general approach to building heights within Channel Gate and that P9 policy o) v. supports tall buildings at appropriate locations throughout Channel Gate. We are concerned by the proposed restriction of building heights to 6 to 8 storeys fronting the Grand Union Canal. Whilst the value of the Canal as a heritage asset and opportunity within Channel Gate, this seems to us to be relatively arbitrary restriction. Given the location of the Canal within Channel Gate, a restriction to 6 to 8 storeys may well restrict a large part of the policy area. There may be opportunities for taller buildings around the Canal, on important corners or fronting the park. We therefore suggest that this requirement is removed.	No change proposed. Policy guidance for general heights along the length of the Grand Union Canal is evidenced by the Grand Union Canal Massing and Enclosure Statement (Update). The study demonstrates that, generally, heights of 6 to 8 storeys should be delivered adjacent to the canal to provide an appropriate sense of enclosure to the canal and canalside spaces. The potential for tall buildings at appropriate locations along the canal is recognised at crossings of key routes and subject to site specific considerations. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.	N	
96	Land owner	Neil	Rowley	Park Score Ltd	5		Strategic Policies		SP9		We do believe there is a real opportunity to provide Tall Buildings within the OPDC area. We are perhaps a little disappointed that the Tall Buildings Strategy is not a little more positive about the potential height of buildings.	No change proposed. OPDC's Tall Building Statement Update continues to identify a tall building as above 15 storeys or above a minimum of 48 metres above ground level. This is based on methodology set out in the Tall Building Statement and is not proposed for modification. The Local Plan does not define building heights for tall buildings. Appropriate heights will be defined through the development management process. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.	N	
96	Land owner	Neil	Rowley	Park Score Ltd	6		Places		P9		Green Infrastructure We support the inclusion of Channel Gate Local Park in principle. However, to ensure the proper master planning of the area, it is important that the location of the proposed park is not constrained by land ownership. Paragraph 4.169 sets out an approach to an equitable equalisation mechanism for the delivery of the secondary school. This mechanism should be similarly applied to the identification of land for (and delivery of) the park. Therefore at the current time we object to the provision of the park due to the lack of any mechanism to equalise the provision of the park across the development site. This could easily be rectified by referencing an equitable equalisation mechanism (similar to that proposed in paragraph 4.169).	Change proposed. The potential for an equitable equalisation mechanism to be used in the delivery of the new Local Park across different land ownership boundaries will be referenced in the supporting text.	Y	96/6

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96	Land owner	Neil	Rowley	Park Score Ltd	7		Places		P9	Paragraph 4.168	<p>Bus Depot</p> <p>Paragraph 4.168 states that the retention and effective operation of the Park Royal Bus Depot will be supported. We have no objection to this in principle but welcome the section of paragraph 4.168 that if the bus depot is no longer required the site can be redeveloped.</p> <p>Indeed the future of bus travel should be factored into this possibility. It may be that buses all become electric vehicles within the Local Plan time frame, in which case the potential for mixed use development incorporating a new bus depot should be considered</p>	<p>Change proposed. While OPDC have not assumed co-location of mixed use development with an operational bus depot when assessing development capacity, OPDC would support proposals for co-location subject to satisfying other relevant policies. Paragraph 4.168 will be modified to reflect that proposals for co-location will be supported in principle.</p>	Y	96/7
96	Land owner	Neil	Rowley	Park Score Ltd	8		Places		P9		<p>Summary</p> <p>As owners of the Park Royal Bus Depot we support the proposals for Channel Gate in principle. Channel Gate is a highly sustainable and accessible location within the Old Oak Opportunity Area. These representations suggest minor changes to allow more flexibility on building heights and to ensure a land equalisation strategy for the provision of the Channel Gate Park.</p> <p>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.</p>	<p>Noted.</p>	N	
97	Local Resident	Peter	Chapman		1		Places		P10C5		<p>In my view the proposal to have high density residential development in tower blocks north of Little Wormwood Scrubs (where I walk frequently from my house in Highlever Road, W10 6PR) is thoroughly misplaced because the proposed tower blocks will dominate the views from Little Wormwood Scrubs, replacing open skies and the refreshing feeling of walking in a semi-rural oasis with tall buildings which are visually intrusive</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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97	Local Resident	Peter	Chapman		2		Places		P10C5		<p>If high densities were considered appropriate in such an area, which I do not think is the case (see my views on public transport below) they can in fact be achieved with blocks mostly not exceeding 5 or 6 storeys high, as can be shown in the recent completed first phase of the redevelopment of the Wornington Green Estate at the northern end of Portobello Road. Renamed Portobello Square this scheme features in an important book, 'Estate Regeneration' by Brendan Kilpatrick and Manisha Patel (Routledge, 2021).</p>	<p>No change proposed.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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97	Local Resident	Peter	Chapman		3		Places		P10		<p>The proposed residential tower blocks proposed for Scrubs Lane are inappropriate as they would dominate views particularly to the east and north east of Wormwood Scrubs, where again I walk regularly and which (at least in this direction) continue to exemplify semi-rural calmness and tranquility, away from urban bustle - so important for feelings of wellbeing, as the Covid-19 pandemic has shown</p>	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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97	Local Resident	Peter	Chapman		4		Places		P10		<p>I am amazed that the proposal for tower blocks in this location remains unchanged, since not one of the four tower blocks approved by OPDC along Scrubs Lane over the past four years (from 2017) has actually been built. Since the London housing market has been buoyant for most of this period, with very considerable unmet demand for housing, it seems to me pretty obvious that OPDC should have had a major strategic rethink on urban form and height, rather than trying to serve up the same untested recipe again. The vision of OPDC does seem to me to be very blinkered. Plenty of more appropriate housing, not exceeding around 5-6 storeys could have been built and occupied in this area by now. The OPDC got it wrong and must now have a major rethink.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. the phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>3 tall buildings have been approved by OPDC since its inception on Scrubs Lane. One of these is now under construction with one shortly to be under construction.</p>	N	

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97	Local Resident	Peter	Chapman		5		Places		P10		<p>It has been a sensible policy in London to confine significant new residential developments, and particularly high density developments, to areas which have very good public transport links - Overground and Underground train stations as well as bus routes. The OPDC area remains dependent on bus routes down Scrubs Lane. Now that the proposed new Overground station at Hythe Road has most unfortunately for all intents and purposes been scrapped for at least the foreseeable future, it seems a nonsense not to adapt the Local Plan to changing circumstances by reducing densities and proposed numbers of dwellings in this particular location. Instead the current proposed 'modified' version proposes an increase in new housing numbers as compared with the 2018 version. The OPDC seems wedded to the past and unable to adapt its Local Plan to changing circumstances.</p>	<p>No change proposed. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>Scrubs Lane will be within a 15 minute walk of Old Oak Common Station and served by new and enhanced bus routes connecting the area to Harlesden, White City, Old Oak Common Station, North Acton and Park Royal. OPDC's Bus Strategy Update developed by TfL defines these bus routes.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	
98	Local Resident	Peter	Warren		1		Strategic Policies		SP9		<p>I am against the building of high rise residential blocks. Especially on scrubs Lane just north of the canal and north of little wormwood scrubs. Good homes should be low level in a carefully planned environment for comfortable living. Transport options for those areas are High rise blocks will obviously affect the skyline looking from the south given a sense of being enclosed. It seems that housing density overrides the provision of long term decent homes and suitable facilities (transport,shops,schools,recreation space and facilities)fora new 'town'</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	

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99	Land owner	Samantha	Wells	Pocket Living	1		Places		P9		We act on behalf of our client, Pocket Living Limited and write in response to the OPDC Post Submission Modified Draft Local Plan (May 2021). In particular, we write in respect of Policy P9: Channel Gate and the supporting Channel Gate Development Framework Principles document (2021). Background Our client is currently engaged in pre-application discussions with OPDC regarding the comprehensive development of the Atlas Wharf site. Located within Channel Gate, the Atlas Wharf site comprises an angular piece of land which abuts The Collective site to the south, the Grand Union Canal to the east, Atlas Road to the west and a waste management facility to the north. Pocket Living are proposing to bring forward a comprehensive scheme comprising of circa. 400 high-quality Build to Rent homes with commercial uses at ground level. The activation and animation of the canal side, for the whole community, is key element of the proposals.	Noted.	N	
99	Land owner	Samantha	Wells	Pocket Living	2		Places		P9		Policy P9: Channel Gate As a principle, we write in strong support of Policy P9: Channel Gate in its vision to create a thriving, residential led mixed-use neighbourhood that contributes to the delivery of a minimum of 3,100 new homes and 600 new jobs during the plan period. Likewise, we are in strong support of the de-designation of strategic industrial land in this location to deliver much needed new homes for Londoners.	Noted.	N	
99	Land owner	Samantha	Wells	Pocket Living	3		Places		P9	O)	Furthermore, we agree with the flexible approach to building heights as set out in bullet (o) which allows for 'generally' 6 to 8 storeys fronting the Grand Union Canal and 'tall buildings at appropriate locations throughout Channel Gate in accordance with Policies SP9 and D4'.	Noted.	N	
99	Land owner	Samantha	Wells	Pocket Living	4		Places		P9	I)	In relation to (i) which discusses public realm and movement, and the principles set out in the accompanying framework document, we are in full support of delivering new and improved walking and cycling routes throughout Channel Gate and we agree that improving permeability is important to successful placemaking in this location. Notwithstanding this, proposed 'new enhanced publicly accessible open space' and 'walking and cycling routes' are diagrammatically shown throughout the Main Modification draft Local Plan (i.e in Figures 4.10, 4.27,4.30 and 4.32) and the Framework document (i.e 3.1, 4.1 and 5.1) to run along the south-east boundary of the Atlas Wharf site which adjoins The Collective's rear servicing area. When assessing the suitability of having a walking and cycling route in this location, we note that The Collective's back of house facilities are currently orientated in this position, thus resulting in little passive surveillance or active frontage. This is undesirable from a safety and placemaking perspective. Furthermore, there is a significant level change contained by a retaining wall between the two sites. We therefore believe this to be an inappropriate location for a pedestrian/cycle corridor, which we have discussed during our pre-application engagement to date. On this basis we would request that the draft Local Plan be amended to make reference to alternative routes to the north of the Atlas Wharf site being appropriate. Alternatively, we request that at the very least the Plan and Framework indicate that the currently proposed routes are "indicative" at this stage and that they would be subject to future detailed design assessment which includes a review of neighbouring sites and technical requirements.	Change proposed. OPDC recognises the challenges that exist in delivering a pedestrian and cycle route along the border of the Atlas Wharf site and Collective site, and agree that the proposed route can alternatively be delivered to the north of the site. The relevant place diagrams will be amended to show the proposed connection and public realm to the north of the Atlas Wharf site.	Y	99/4

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99	Land owner	Samantha	Wells	Pocket Living	5		Places		P9		<p>Summary</p> <p>In summary, we are supportive of Policy P9: Channel Gate. However, we request that the OPDC consider the point raised above regarding the routes. This is in order to ensure that the full re-development potential of our client's site is achieved in accordance with the strategic ambitions of the emerging Local Plan. We look forward to confirmation of receipt of these representations and welcome any questions you may have or further discussion. If you have any queries regarding the content of this letter, please do not hesitate to contact Sam Wells or Luke Davies of the above office.</p>	Noted.	N	
100	Land owner	Andrew	Black	Raban Management Limited	1		Places		P9		<p>I write to submit representations on behalf of my client (Raban Management Ltd) in relation to the Main Modifications Consultation for the Old Oak and Park Royal Development Corporation (OPDC) Local Plan.</p> <p>My client has a land holding known as the Former Railway Institute (FRI) at Goodhall Street with development aspirations for a comprehensive redevelopment of the site. There is direct link between this site and the development aspirations of OPDC in relation to the Channel Gate area. Specific representations are set out in relation to that aspect of the Main Modifications in detail within this letter.</p>	Noted.	N	
100	Land owner	Andrew	Black	Raban Management Limited	2		Development Capacity Study				<p>The site itself forms part of the wider land which is identified in the updated Development Capacity Study as site reference 54 (Goodall Street Industrial Estate and Site to West). This sets out the following in relation the capacity of the site for development</p> <p><i>Suitable: The principle for development on the site was previously established as part of the Park Royal SIL broad location and was identified for development in the OPDC Regulation 18 and 19(1) Local Plan, the GLA Old Oak and Park Royal OAPF and the Victoria Road and Old Oak Lane Development Framework Principles.</i></p> <p><i>Since the development of the Regulation 19(1) Local Plan, further assessment has been carried out in the Industrial Land Review Addendum (2018) recommending the site is released from SIL for mixed used development.</i></p> <p><i>Constraints are considered to be able to be addressed through design and operation of development.</i></p> <p><i>Available: Single land ownership [Note the site is not within a single land ownership]. Discussions with land owners suggests availability. Planning permission for part of site (80 Goodhall Street) confirms availability.</i></p> <p><i>Achievable: OPDC Whole Plan Viability Assessment considers that mixed use development is viable across areas outside of SIL. Planning permission for 80 Goodhall Street also confirms viability.</i></p> <p><i>Summary: Site identified for development in Regulation 19(2) Local Plan policy for mixed use development following updated recommendations of OPDC's ILR.</i></p> <p><i>Constraints are considered to be able to be addressed in the design and operation of development. Part of site (80 Goodhall Street) has secured planning permission (resolution to approve) on 9 September 2020 (195346OPDCFUL). Site expected to be developed in the plan period subject to engagement with landowners.</i></p> <p>It is therefore considered that the site has a significant role to play in the delivery of development in accordance with the aspirations of the emerging development plan.</p>	Noted. The site is located within the Old Oak Lane Conservation Area. As such it is part of a designated heritage asset. Proposals to develop designated assets are required to accord with relevant national guidance for listed assets and OPDC's Local Plan policy D7 The building is also locally listed.	N	

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100	Land owner	Andrew	Black	Raban Management Limited	3		Channel Gate DFP			Figure 3.1	<p>It is understood that OPDC is proposing to remove the 'Strategic Industrial Location' designation from the wider site in order to support the delivery of new homes and jobs within the local plan period.</p> <p>Figure 3.1 within the Channel Gate Development Framework Principles document sets out the future opportunities for developments of Channel Gate. It indicates an area for a new and enhanced connection through the site within the ownership of my client. The extract from figure 3.1 has been included below with the land under the ownership of my client indicated.</p> <p>The land within the ownership of my client is set out below and the area indicated for access has been superimposed to demonstrate the potential area required. Also indicated is the area for a 'potential future key route' which would go around the rear of the site and access Old Oak Lane but crosses land currently occupied by the railway.</p>	<p>Noted.</p> <p>The Channel Gate Development Framework Principles is not a detailed masterplan for the site, but sets out the vision for the place and provides a set of principles to provide guidance for future development of the site.</p> <p>The alignment of the proposed connection from Stephenson St to Channel Gate as shown in in the Channel Gate Development Framework, is indicative only, and has not been identified in Local Plan places diagrams for either Policies P9 or P8 or in the IDP and there is not therefore a safeguarding requirement for this connection.</p> <p>The potential future link from Channel Gate to Old Oak Lane north of the railway cottages is presented only an aspiration. It's deliverability will be assessed through further proposals for the reprovion of Willesden Freight Terminal site and overall movement network for Channel Gate and the surrounding area.</p>	N	
100	Land owner	Andrew	Black	Raban Management Limited	4		Channel Gate DFP			Figure 2.2	<p>As set out, my client has development aspirations for the site and has previously prepared information for pre-application discussions with the council and other stakeholders. This was informed and influenced by the application on the land adjacent to this site at 80 Goodhall Street which was granted planning permission in 2020 under application 195346ODPFUL for the following development: <i>Construction of a part nine and part four storey building with excavation of basement area to provide 38 self-contained residential units and community space with associated cycle parking, refuse storage, hard and soft landscaping for amenity space and children's play space (Following demolition of existing building and change of use).</i></p> <p>The site is noted within figure 2.2 (Local Context) of the Channel Gate Framework Document as a Major Permitted Development.</p> <p>A pre-application document was prepared which sought to demonstrate the potential development of the undeveloped part of the site for up to 23 dwellings. However, this was prior to the approval of the adjoining site for a nine storey residential development which has highlighted the potential for a significant increase in density within the immediate area.</p> <p>Within the Channel Gate Development Framework Document, the new proposed access route to Goodhall Street would pass through the area envisaged for development as part of the proposals. This has been overlaid on the plan prepared as part of the pre-application document and is indicated below.</p>	<p>Noted.</p> <p>The Channel Gate Development Framework Principles is not a detailed masterplan for the site, but sets out the vision for the place and provides a set of principles to provide guidance for future development of the site.</p> <p>The alignment of the proposed connection from Stephenson St to Channel Gate as shown in in the Channel Gate Development Framework, is indicative only, and has not been identified in Local Plan places diagrams for either Policies P9 or P8 or in the IDP and there is not therefore a safeguarding requirement for this connection.</p>	N	
100	Land owner	Andrew	Black	Raban Management Limited	5		Places		P9		<p>The requirement to deliver a 19,850 homes across the 20-year plan period represents a significant commitment from OPDC. The substantial contribution made by both the Channel Gate and Scrubs Lane area forms an integral part of this plan and is supported. However, both area, particularly Channel Gate are very large areas of land which are likely to have longer lead in times, notwithstanding significant infrastructure requirements prior to housing being delivered on the site.</p>	<p>Noted.</p>	N	

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100	Land owner	Andrew	Black	Raban Management Limited	6		Places		P9		As set out in paragraph 68 of the NPPF the delivery of small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often builtout relatively quickly. It is considered that the land under the control of my client represents such a site that can deliver in the early part of the plan period and also forms an important gateway into the Channel Gate development.	Noted.	N	
100	Land owner	Andrew	Black	Raban Management Limited	7		Places		P9		Paragraph 127 of the NPPF states that planning policies and decisions should ensure that developments (inter alia): (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support facilities and transport networks It is considered that the site has a high degree of potential to accommodate an appropriate amount of development whilst also contributing to the delivery of other aspirations as set out within the Channel Gate Framework such as the Old Oak Community Garden and the pedestrian / cycle link through to the main development area.	Noted. Paragraph 8.9, in the supporting text to Policy H1, of the Local Plan clarifies that proposals for windfall housing will be supported where they are in accordance with other Local Plan policies.	N	
100	Land owner	Andrew	Black	Raban Management Limited	8		Places		P9		The Planning Practice Guidance sets out clear guidance on the effective use of masterplans as follows: <i>Whoever prepares them, masterplans can benefit from a collaborative approach between the local planning authority, site promoters and local communities so that aspirations and constraints are understood early on. Masterplans produced by local planning authorities may be adopted as supplementary planning documents to give them weight in decisions on applications. Masterplans often apply to schemes that are developed over a long time period and so may need to be subject to regular review and be flexible to adapt to changing circumstances.</i> <i>Care should be taken to ensure that masterplans are viable and well understood by all involved and that graphic representations of what the development will look like do not mislead the public by showing inaccurate details or significant elements not yet decided upon.</i> <i>Paragraph: 007 Reference ID: 26-007-20191001</i> <i>Revision date: 01 10 2019</i> As set out, the principles within the Channel Gate Development Framework are supported. Including the principle for access through the site and also for the Old Oak Common Community Garden to the south. However, it is clear that further work would be required between my client and the council in order to achieve the aspirations in so far as access through the site to the masterplan area and other elements. It is therefore suggested that this dialogue is prioritised and fast tracked in order for this element of the masterplan to be shown as deliverable and achievable.	Noted. The Channel Gate Development Framework Principles is not a detailed masterplan for the site, but sets out the vision for the place and provides a set of principles to provide guidance for future development of the site. The potential future link from Channel Gate to Old Oak Lane north of the railway cottages is presented only an aspiration. It's deliverability will be assessed through further proposals for the reprovision of Willesden Freight Terminal site and overall movement network for Channel Gate and the surrounding area. The alignment of the proposed connection from Stephenson St to Channel Gate as shown in in the Channel Gate Development Framework, is indicative only, and has not been identified in Local Plan places diagrams for either Policies P9 or P8 or in the IDP and there is not therefore a safeguarding requirement for this connection.	N	

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100	Land owner	Andrew	Black	Raban Management Limited	9		Places		P9		Equally it is important to my client that if areas of the site are to be given over to access to the wider Channel Gate development then this is acknowledged and compensated through the potential of a higher density development on the remainder of the development area in its entirety (including the FRI Building). The principle for development at increased densities has been well established through the approved development for a 9 storey residential building on the adjoining site at 80 Goodhall Street and it is anticipated that a similar approach could be adopted for this site.	Noted. The supporting text to Policy SP10 (paragraph 3.92) notes that there will be occasions where infrastructure to support site wide delivery will need to be based on equitable equalisation mechanism to allow development to proceed.	N	
100	Land owner	Andrew	Black	Raban Management Limited	10		Channel Gate DFP				It is considered that it would be logical to include the land under the control of my client within the boundary of the Channel Gate Development Framework Document in order to establish the principle of development and the access through the site to the wider area.	No change proposed. The subject site has not been identified as a potential development site, and has it been identified as a site required to for necessary infrastructure to support development. As such, it is not considered appropriate to include within the boundary of the Channel Gate Development Framework Principles Study. Due to its location within the Island Triangle neighbourhood, the subject site is located within Place Policy P8 (Old Oak Lane and Old Oak Common). Any proposals will be assessed against the provisions of that place policy.	N	
100	Land owner	Andrew	Black	Raban Management Limited	11		Places		P9		My client would be prepared to enter into a Statement of Common Ground so that these matters can be presented to the inspector and I look forward to continuing discussions on this basis with the authority in the near future.	Noted.	N	
101	Local Resident	Robert	McAdie		1		General	General			I am writing as a long term resident in the area and user of Wormwood Scrubs.	Noted.	N	
101	Local Resident	Robert	McAdie		2		Strategic Policies		SP8		1. The proposed plan does not have the interests of local residents at heart. No provision has been made for green spaces, public amenity areas and a general feeling of light and space that people need to enjoy a reasonable quality of life. The main objective appears to be maximum profit over sustainability, harmony and basic good design.	No change proposed. In addition to the protection and enhancement of existing green space, the Local Plan requires new development to contribute towards 30% of the developable land outside of SIL to be delivered as publicly accessible open space. This includes the creation of two new Local Parks of a minimum 2 ha in size located at Channel Gate and Old Oak South.	N	

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101	Local Resident	Robert	McAdie		3		Places		P10		<p>2. The proposed development at the end of Mitre Way features buildings of overwhelming density, completely inappropriate for the area and bearing no respect whatsoever for local residents. Besides this, it seems that no one has considered how this development will affect the traffic on North Pole Road. The junction where it joins Wood Lane and Scrubs Lane is already extremely congested as well as dangerous, with vehicles accelerating up the wrong side of the road to turn right at the lights. This ill thought out plan would leave traffic at a standstill.</p>	<p>No change proposed.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can then continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects with the eastern entrance of Old Oak Common station via the Grand Union Canal, and the second that connects Old via Union Way and Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on this junction, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area in including providing bus access to Old Oak Common station. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p>	N	

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101	Local Resident	Robert	McAdie		4		Strategic Policies		SP8		3. There is little or no consideration for providing green spaces for recreation and well being. The importance of this is now widely acknowledged and proven to improve mental and well as physical health, and yet the plan merely makes lazy references to providing 'access to nature,' and 'integrating green spaces.' This means little or nothing. What's more, Wormwood Scrubs itself must not be commandeered for this purpose. The Scrubs has already suffered during the last year due to extra footfall, and the toll on the wildlife has been great. This has been further exacerbated by HS2, which has caused significant destruction. It should be protected, not exploited by OPDC and used to tick a 'green spaces' box. Genuine new green spaces should be created.	No change proposed. In addition to the protection and enhancement of existing green space including Wormwood Scrubs, the Local Plan requires new development to contribute towards 30% of the developable land outside of SIL to be delivered as publicly accessible open space. This includes the creation of two new Local Parks of a minimum 2 ha in size located at Channel Gate and Old Oak South.	N	
101	Local Resident	Robert	McAdie		5		Design				4. There appears to be no harmony at all in the mass of tall buildings proposed. The area has already lost huge amounts of sky views from recent developments such as the jarring Imperial College development. The last thing that's needed is more tall buildings of random design blighting our skyline. These buildings will still be there long after we are all dead and gone and OPDC need to take the design seriously rather than focus on maximum scale and profit. It is surely time to go back to the drawing board and design something that Londoners can be proud of, that shows urban design at its best and has the needs of the community at its heart. Having lived in the area for over twenty years I dread seeing more damage done by greedy property developers with ill thought out designs such as this one. I reject this modified draft plan for all the reasons above.	No change proposed. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
102	Local Resident	Rose	V Parr		1		Strategic Policies		SP7		Additional traffic issues and overcrowded transportation (trains) in the area The OPDC claimed in its draft plan that the new proposed housing will be " well connected", however with the Old Oak stations idea scrapped, these locations will put extra pressures on local traffic and transportation issues that existed way before the HS2 construction/disruption had begun	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. In line with OPDC's sustainable transport hierarchy, movement by foot, bike and public transport has been prioritised across the OPDC area to reduce private car trips. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. In addition, the Local Plan includes policies to control car parking levels, reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.	N	

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102	Local Resident	Rose	V Parr		2		Places		P9		<p>Destroying the appeal of living in the area. The modified local plan's idea of using Willesden Euroterminal Channel Gate for high rise / high-density living will destroy the appeal and character of the existing low rise residential areas. The OPDC's assumptions through the draft plan that high rise accommodation is desirable for people is utterly controversial. The Grenfell tragedy is still unresolved, the London cladding scandal left many leaseholders still living a nightmare!</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Channel Gate was previously identified for a high density industrial area. The proposed modifications continue to identify this area for high density development.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	

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102	Local Resident	Rose	V Parr		3		General	Extent of changes			Lack of transparency/ consultation with the locals impacted. The existing low rise residential areas have been inadequately consulted. The face to face meetings was not possible during the pandemic and the OPDC has offered limited online sessions to inform the local community of its drastic change to its plan of moving the high rise housing from the Car Giant site to new sites by existing homes.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	

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103	Local Resident	Rosemarie	Cleary		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
103	Local Resident	Rosemarie	Cleary		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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103	Local Resident	Rosemarie	Cleary		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
103	Local Resident	Rosemarie	Cleary		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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103	Local Resident	Rosemarie	Cleary		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
103	Local Resident	Rosemarie	Cleary		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
103	Local Resident	Rosemarie	Cleary		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, Old Oak Common Lane station and North Acton station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
103	Local Resident	Rosemarie	Cleary		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport. Policy T6 prevents new residents from applying for parking permits for CPZs in neighbouring streets.</p>	N	

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103	Local Resident	Rosemarie	Cleary		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
103	Local Resident	Rosemarie	Cleary		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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103	Local Resident	Rosemarie	Cleary		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
103	Local Resident	Rosemarie	Cleary		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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103	Local Resident	Rosemarie	Cleary		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
103	Local Resident	Rosemarie	Cleary		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
104	Local Resident	Rosemary	Mortimer		1		General	Support for community group comments			<p>This is just to say that I support the views of the St Quintin and Woodlands Neighbourhood Forum.</p>	<p>Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments</p>	N	

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105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	1		General	General			The Royal Borough welcomes the opportunity of further comments in relation to the above consultation. As far as this Council is concerned these revolve around the North Pole East coming forward within the Local Plan period. The principle of this is supported as it provides the opportunity of better and new links being provided between Kensington and Chelsea and OPDC.	Noted.	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	2		Places	P10C5			POLICY P10C5: Mitre Way Cluster –connecting Mitre Way with Scrubs Lane The Council supports the site allocation for the place of Scrubs Lane. This allocation is directly linked to RBKC's North Pole Depot site, which forms part of the Kensal Canalside Opportunity Area. RBKC and OPDC officers have work proactively in the development of OPDC's Local Plan and the Draft Kensal Canalside SPD, as these documents have clear interaction. As a result, coordinated and consistent guidance is provided for the Kensal Canalside / Scrubs Lane area.	Noted.	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	3		Places	P10C5			The combined guidance within the OPDC Local Plan and the Kensal Canalside SPD will ensure that the area delivers well connected good growth and that the development capacity, phasing, land uses and indicative building heights on the North Pole Depot development site, that comprises locations within both the OPDC and RBKC areas, are coordinated and complimentary.	Noted.	N	

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105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	4		Places		P10C5		RBKC specifically welcomes the inclusion of the proposed east to west route (known as Wormwood Scrubs Street within the OPDC Local Plan and South Street in the Kensal Canalside SPD) connecting Ladbroke Grove within RBKC to Scrubs Lane within OPDC during the OPDC Local Plan period (ending 2038) and to Old Oak Common Station and Old Oak Common Lane beyond the OPDC Local Plan period. This will provide a vital east west connection for the opportunity area, ensuring a well-connected neighbourhood and in the long term providing a link to the Old Oak Station hub. The new policy identifies the need to safeguard land to allow a continuous east west road link to be delivered in the future and this is welcome as it could provide the hook for compulsory purchase if the need arises.	Noted.	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	5		Places		P10C5		The proposed bus route and walking and cycling routes along Wormwood Scrubs Street / South Street are also welcome additions to the Local Plan, with the bus route providing an important westward public transport route.	Noted.	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	6	MM/PS2/OPDC/P1/5	Places		P10C5		The modification MM/PS2/OPDC/P1/5 to support active and positive frontages along the edge of the Elizabeth line depot and along the walking and cycling route from Old Oak Common station to Scrubs Lane where feasible, is supported.	Noted.	N	

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105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	7		Places		P10C5		The removal of Hythe Road station from the plan is disappointing as that would have been the means of connecting the western side of our borough to the Elizabeth line and HS2. However, as this change was necessitated by the outcome of the Car Giant case the Council accept that it cannot be avoided.	<p>Noted. The purpose of Hythe Road station was to serve residential developments proposed in Old Oak North. Now that this area is no longer being brought forward for residential-led development, there is no longer a need or business case for Hythe Road station.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. This includes services to Kensal Canalside Opportunity Area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling to RBKC.</p>	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	8		Design		D4/D5/D6		The Council accepts that development coming forward in this area over and above the one tall building allocated (15 storeys) will inevitably be seen from the park at Little Wormwood Scrubs and views from the park will change as a result. However, whilst we support the principle of development, there is potential that the views from the park may suffer harm – and so buildings brought forward need to consider very carefully their relationship with the sensitive RBKC context.	<p>Noted. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	9		Design		D4/D5/D6		The sensitivity of the park, St Mary's cemetery to the north east and the Grade one listed Kensal Green cemetery, mean it will be essential that any proposals for tall buildings coming forward here are appraised in line with Policy D9 of the London Plan. This will mean proposals will need to be appraised to assess the impacts at different distances including immediate to long range views, that tall buildings should reinforce the spatial hierarchy of the local and wider context, that architectural quality and materials should be of an exemplary standard and that proposals should take account of and avoid harm to the significance of heritage assets and their settings.	<p>Noted. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Any proposal will be determined using development plan policies, including the London Plan, and material considerations.</p>	N	

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105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	10		Design		D4/D5/D6		As Policy D9 states, proposals that do involve harm will need clear and convincing justification, demonstrating that alternatives have been explored and that clear public benefits outweigh that harm and that buildings should positively contribute to the character of the area. To this end the following amendments to major modifications are noted and supported. However, they must also be implemented.	Noted.	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	11	MM/PS/OPDC/M4	Strategic policies		SP9		MMPS/OPDC/M4 that local context, character, and environmental impacts are important factors to consider in the design process with development coming forward with a range of densities and lower heights in more sensitive locations.	Noted. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	12	MM3/PS/Q3, MM4/PS/Q3g	Design		D2 c), D4 c)	5.26	The rewording shown at MM3/PS/Q3 where it must be demonstrated that engagement with relevant stakeholders has informed the design of proposals. In a similar vein MM4/ PS/Q3c stating that proposals coming forward should demonstrate proactive engagement with the community and other relevant stakeholders.	Noted.	N	

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105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	13	MM/PS2/OPDC/H8/1	Housing		H8	8.69	The modification MM/PS2/OPDC/H8/1 to remove reference to the wider definition of Gypsy and Travellers that was previously proposed by the draft London Plan is supported.	Noted.	N	
105	Local Authority	Jonathan	Wade	Royal Borough of Kensington and Chelsea	14	MM/PS2/OPDC/P2/1	Places		P2 b)	4.38	The main modification MM/PS2/OPDC/P2/1 now clearly safeguards Old Oak sidings (Powerday waste site) for continued use as a waste management site, this aspect of the main modification is supported. It is noted in that the updated supporting text at paragraph 4.38 states that Old Oak sidings waste site is capable of increasing its waste throughput and potentially generating a surplus. We would welcome continued joint working and discussions on how any surplus could assist Kensington and Chelsea meet its London Plan waste apportionment.	Noted. OPDC welcome continued discussions with RBKC.	N	
106	Local Resident	Ruth	Hillary		1		Places		P1		There is little consideration of how people with access the new station at Old Oak Common from Scrubs lane, which is my closest access point. It appears I will need to walk over 3/4 of an our to get to the station. I can't see what buses will go to the eastern end of the station, if there is taxi or car drop off possibilities(what if people are carrying luggage) , so therefore, once again North Kensington residents are ignored. And joined up thinking to improve public transport is not taken into account.	No change proposed. The Local Plan proposes a new pedestrian/ cycle connection linking the eastern entrance of Old Oak Common station to Scrubs Lane via the Grand Union canal. Journey times along this route are approximately 11 minutes by foot and 5 minutes by bike. There are also alternative means of pedestrian and cycle access from Scrubs Lane to the Old Oak Common station via Old Oak North. Beyond the Local Plan period, Wormwood Scrubs Street will also provide access to the Old Oak Common station from the south. The station will also be served by several bus routes to the east - bus routes 7, 220 and 487 - as set out in OPDC's Bus Strategy and policy T6. Taxis and drop off location has not changed and is accessible to the wider road network, including from the east of the site, from Old Oak Common Lane.	N	

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106	Local Resident	Ruth	Hillary		2		Strategic Policies		SP9		Why are the proposals for high density new housing in a post COVID era where people want outside space and not to be cooped up in flats in the sky. This is out of step with what society needs and is simply to make profit. Will these high rise towers be without cladding? Will they be safe? These questions have not been addressed.	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
106	Local Resident	Ruth	Hillary		3		Strategic Policies		SP7		where is the public transport system to support these new residences since there is not new overground station at Hythe Road (MM/PS2/OPDC/P2/1).	No change proposed. The Infrastructure Delivery Plan sets out significant investments in public transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	
106	Local Resident	Ruth	Hillary		4		Strategic Policies		SP7		With all this high density towers there has been no consideration of the traffic density at North Pole road already experiencing long traffic queues and increased pollution for local residences, shops and the local secondary school. Car free development doesn't mean vehicle free as no account is taken of devlries (increased with the COVID pandemic) and taxis. How will the revised local plan deal with increased traffic congestion hot spots. It hasn't. It has ignored this fact.	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive schedule of upgrades to the existing road network and junctions to increase capacity as well as new road links to support growth. In line with OPDC's sustainable transport hierarchy, movement by foot, bike and public transport has been prioritised across the OPDC area to reduce private car trips. In addition, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.	N	

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106	Local Resident	Ruth	Hillary		5		General	Extent of changes			<p>I receive the consultation letter in May, the description of changes to the local plan was misleading as it appeared to suggest there were few changes that would impact my area and the local community however the changes appear to be significant.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	

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107	Local Resident	Sandra	O'Sullivan		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
107	Local Resident	Sandra	O'Sullivan		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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107	Local Resident	Sandra	O'Sullivan		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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107	Local Resident	Sandra	O'Sullivan		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
107	Local Resident	Sandra	O'Sullivan		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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107	Local Resident	Sandra	O'Sullivan		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		These are the key points we wish to make: • OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	
107	Local Resident	Sandra	O'Sullivan		7	Major Modification Figure/PS2/OPDC/PM2	Transport				These are the key points we wish to make: • The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2	No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Acton station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.	N	
107	Local Resident	Sandra	O'Sullivan		8		Transport		T4		These are the key points we wish to make: • High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.	N	
107	Local Resident	Sandra	O'Sullivan		9		Housing				These are the key points we wish to make: • High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners.	No change proposed. There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety. The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.	N	

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107	Local Resident	Sandra	O'Sullivan		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	
107	Local Resident	Sandra	O'Sullivan		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	

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107	Local Resident	Sandra	O'Sullivan		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	
107	Local Resident	Sandra	O'Sullivan		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
107	Local Resident	Sandra	O'Sullivan		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrated how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated</p>	N	

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108	Local Resident	Sarah & Jane	Abrahart		1		General	General			I am writing in response to the above plan in my capacity as a Hammersmith and Fulham resident who is also a frequent visitor to Wormwood Scrubs open space. I've lived in this area for over 25 years. I am a trustee/committee member of Friends of Wormwood Scrubs and this is my personal response to the plan. I know The Friends and many other individual neighbours are making their own representations, so I am focussing on a limited number of objections.	Noted.	N	
108	Local Resident	Sarah & Jane	Abrahart		2		Places		P12		<p>1. The exploitation of Wormwood Scrubs beyond what it can sustain. The plan as a whole has totally insufficient provision for open, green recreational space for so many new residents and workers, so they will have few choices other than to go to Wormwood Scrubs. Yet the OPDC seems to have made no provision whatsoever for protecting the fragile natural habitat of Wormwood Scrubs from such massively increased footfall. Wormwood Scrubs as a natural habitat will suffer terribly yet - just one example - the plan actually refers to "vegetation" as an obstacle to be cleared away to enable cyclists and walkers travelling from the north to "access" the Scrubs more easily! Presumably this means cutting down more woodland, just after HS2 have cut down a lot already?</p> <p>How is destroying vegetation in order to save some cyclists the trouble of cycling a few yards further down Scrubs Lane helping the already severely stressed species clinging to existence on Wormwood Scrubs?</p> <p>The impression is given that underlying this kind of suggestion, and the plans for Wormwood Scrubs in general, is a powerful desire to exploit the green space as much as possible, using its presence to liberate developers from the obligation to allow for recreational space in their own plans and thus to cram in more buildings. The Scrubs as we know it will wither as a biodiverse habitat for birds and other species.</p>	<p>No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site.</p> <p>Policy P12 protects Wormwood Scrubs as Metropolitan Open Land and as an area of ecological value. Any proposals involving impacts on areas of ecological value would need to reprove a net gain in biodiversity in accordance with Policy EU2. Both Policy P12 and EU2 remain largely unaltered since the submission of the Local Plan.</p> <p>Providing improved access to Wormwood Scrubs is justified to support it's role as a Metropolitan Park serving the wider West London area, and it's role as set out in the Wormwood Scrubs Act. Any proposals for such improvements would need to be undertaken in agreement with the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust.</p>	N	
108	Local Resident	Sarah & Jane	Abrahart		3		Spatial Vision				<p>2. The lack of awareness of needs post-pandemic I feel the spirit of the plan is entirely pre-pandemic, lacking forethought as to what London and Londoners need, and what nature needs post-pandemic.</p> <p>A bolder vision could have included a new rewilding project, for example, perhaps contiguous to the Scrubs - and far more green space.</p> <p>A bolder vision would have included lower density housing with more scope for communal gardens in which residents can do their own gardening, instead of being limited to the occasional balcony tomato plant.</p> <p>A bolder vision would have recognised that nature and the natural world needs to be protected, not merely exploited.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that is an exemplar in healthy and sustainable large-scale development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity. Policy D5 requires development to deliver private and communal open space in accordance with Mayoral guidance and requires development to provide space for food growing.</p>	N	

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108	Local Resident	Sarah & Jane	Abrahart		4		Design		D4		<p>3. Lack of awareness of the impact of tall buildings As the plan stands, the many tall buildings around the area will block out sunlight and rain for most of the day and create dark, arid wind tunnels (for example, at Old Oak Gardens and Stamford Gardens). The proposed small green spaces in their vicinity will be of limited biodiversity, inaccessible and inhospitable to species and suffering heavy human footfall. Tall buildings also create a boxed-in, claustrophobic feeling on the Scrubs similar to that at Central Park in New York, which I would hold up as a perfect example of what we do NOT want the Scrubs to look like.</p>	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The Scrubs Lane Development Framework Principles is supported by an updated Scrubs Lane Strategic Views Assessment that assessed the proposed modifications to policy P10 buildings heights guidance in relation to the impact on heritage assets and townscape. The updated outcome of the assessment has not changed.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
108	Local Resident	Sarah & Jane	Abrahart		5		Strategic Policies		SP8		<p>4. Unrealistic and/or vague attitude to nature In the different sections of the plan, there are references to "enhancing" green spaces and even to "relocating" nature reserves such as Birchwood Nature Reserve. It is not clear what "enhancing" means. Relocation of a nature reserve is not a realistic aim if the preservation of nature is required - a habitat cannot be simply "relocated" and planting saplings in another place is not the same thing.</p>	<p>No change proposed. The purpose of SP8 is to ensure that development protects and enhances green and public space and ensuring that if there is any loss, there is re-provision to an equal or better quantum and quality. The meaning of enhancement is to improve areas of ecological value.</p>	N	
108	Local Resident	Sarah & Jane	Abrahart		6		Environment and Utilities		EU1		<p>There are unintelligible references to "integrating green spaces" (what does this mean?), to "providing access to nature" with scant reference to how nature is to be protected from our access to it. The images used to give us an idea of what the area will look like feature bleak concrete pavements and the astroturf steps at Kings Cross Granary Square - astroturf is probably one of the most significantly malevolent attacks on the natural world around in London today - it smothers the earth, leaves plastic residue and confuses birds who waste valuable energy landing on it and trying to find food.</p>	<p>No change proposed.</p> <p>The regeneration of the OPDC area will be underpinned by a comprehensive network of green infrastructure, which will need to serve the needs of both people and nature.</p> <p>All proposals will need to ensure at least a net gain in biodiversity and proposals for new public open spaces will need to be accompanied by a management plan setting out how of areas of biodiversity will be maintained and managed in the longer term.</p> <p>Proposals will also be required to undertake an Urban Greening Factor (UGF) assessment in order to optimise urban greening within development.</p>	N	

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108	Local Resident	Sarah & Jane	Abrahart		7		General	Delay or withdraw the plan			<p>I cannot see why this plan has to be accepted in its present form. There should be no rush and it should be completely reconsidered. If the pandemic has taught us anything it is that our relationship with nature should be rethought.</p>	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

108	Local Resident	Sarah & Jane	Abraham	8	General	Consultation	<p>We look forward to this plan being thoroughly revised & worked through without unnecessary haste. We also look forward to vastly improved community engagement & actually taking on board & adopting the concerns & valid suggestions of the affected local residents.</p> <p>We attended numerous workshops & events on the original local plan & although we know that this plan was shelved, it was quite clear the draft had taken absolutely none of the residents' & stakeholders contributions & ideas into account.</p> <p>The events were a total waste of time & obviously just paying lip service.</p> <p>This local plan is incoherent & totally out of character for our neighbourhood & we do not want or need monolith monstrosities that OPDC call homes.</p> <p>We implore you to please seriously consider all of these objections.</p> <p>We have had, and continue to have, many sleepless nights fretting over OPDC plans and the detrimental impact on our lovely quiet neighbourhood and to the tranquility of our precious Wormwood Scrubs, which is recognised as a very rare London gem.</p>	<p>No change proposed.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 	N
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												OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
109	Local Resident	Sarah	Johnson		1		General	General			I am writing in response to the above plan in my capacity as a Hammersmith and Fulham resident who is also a frequent visitor to Wormwood Scrubs open space. I've lived in this area for over 25 years. I am a trustee/committee member of Friends of Wormwood Scrubs and this is my personal response to the plan. I know The Friends and many other individual neighbours are making their own representations, so I am focussing on a limited number of objections.	Noted.	N	
109	Local Resident	Sarah	Johnson		2		Places		P12		<p>1. The exploitation of Wormwood Scrubs beyond what it can sustain. The plan as a whole has totally insufficient provision for open, green recreational space for so many new residents and workers, so they will have few choices other than to go to Wormwood Scrubs. Yet the OPDC seems to have made no provision whatsoever for protecting the fragile natural habitat of Wormwood Scrubs from such massively increased footfall. Wormwood Scrubs as a natural habitat will suffer terribly yet - just one example - the plan actually refers to "vegetation" as an obstacle to be cleared away to enable cyclists and walkers travelling from the north to "access" the Scrubs more easily! Presumably this means cutting down more woodland, just after HS2 have cut down a lot already?</p> <p>How is destroying vegetation in order to save some cyclists the trouble of cycling a few yards further down Scrubs Lane helping the already severely stressed species clinging to existence on Wormwood Scrubs?</p> <p>The impression is given that underlying this kind of suggestion, and the plans for Wormwood Scrubs in general, is a powerful desire to exploit the green space as much as possible, using its presence to liberate developers from the obligation to allow for recreational space in their own plans and thus to cram in more buildings. The Scrubs as we know it will wither as a biodiverse habitat for birds and other species.</p>	<p>No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site.</p> <p>Policy P12 protects Wormwood Scrubs as Metropolitan Open Land and as an area of ecological value. Any proposals involving impacts on areas of ecological value would need to reprovide a net gain in biodiversity in accordance with Policy EU2. Both Policy P12 and EU2 remain largely unaltered since the submission of the Local Plan.</p> <p>Providing improved access to Wormwood Scrubs is justified to support it's role as a Metropolitan Park serving the wider West London area, and it's role as set out in the Wormwood Scrubs Act. Any proposals for such improvements would need to be undertaken in agreement with the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust.</p>	N	
109	Local Resident	Sarah	Johnson		3		Spatial Vision				<p>2. The lack of awareness of needs post-pandemic I feel the spirit of the plan is entirely pre-pandemic, lacking forethought as to what London and Londoners need, and what nature needs post-pandemic.</p> <p>A bolder vision could have included a new rewilding project, for example, perhaps contiguous to the Scrubs - and far more green space.</p> <p>A bolder vision would have included lower density housing with more scope for communal gardens in which residents can do their own gardening, instead of being limited to the occasional balcony tomato plant.</p> <p>A bolder vision would have recognised that nature and the natural world needs to be protected, not merely exploited.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that is an exemplar in healthy and sustainable large-scale development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity. Policy D5 requires development to deliver private and communal open space in accordance with Mayoral guidance and requires development to provide space for food growing.</p>	N	

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109	Local Resident	Sarah	Johnson		4		Design		D4		<p>3. Lack of awareness of the impact of tall buildings As the plan stands, the many tall buildings around the area will block out sunlight and rain for most of the day and create dark, arid wind tunnels (for example, at Old Oak Gardens and Stamford Gardens). The proposed small green spaces in their vicinity will be of limited biodiversity, inaccessible and inhospitable to species and suffering heavy human footfall. Tall buildings also create a boxed-in, claustrophobic feeling on the Scrubs similar to that at Central Park in New York, which I would hold up as a perfect example of what we do NOT want the Scrubs to look like.</p>	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The Scrubs Lane Development Framework Principles is supported by an updated Scrubs Lane Strategic Views Assessment that assessed the proposed modifications to policy P10 buildings heights guidance in relation to the impact on heritage assets and townscape. The updated outcome of the assessment has not changed.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
109	Local Resident	Sarah	Johnson		5		Strategic Policies		SP8		<p>4. Unrealistic and/or vague attitude to nature In the different sections of the plan, there are references to "enhancing" green spaces and even to "relocating" nature reserves such as Birchwood Nature Reserve. It is not clear what "enhancing" means. Relocation of a nature reserve is not a realistic aim if the preservation of nature is required - a habitat cannot be simply "relocated" and planting saplings in another place is not the same thing.</p>	<p>No change proposed. The purpose of SP8 is to ensure that development protects and enhances green and public space and ensuring that if there is any loss, there is re-provision to an equal or better quantum and quality. The meaning of enhancement is to improve areas of ecological value.</p>	N	
109	Local Resident	Sarah	Johnson		6		Environment and Utilities		EU1		<p>There are unintelligible references to "integrating green spaces" (what does this mean?), to "providing access to nature" with scant reference to how nature is to be protected from our access to it. The images used to give us an idea of what the area will look like feature bleak concrete pavements and the astroturf steps at Kings Cross Granary Square - astroturf is probably one of the most significantly malevolent attacks on the natural world around in London today - it smothers the earth, leaves plastic residue and confuses birds who waste valuable energy landing on it and trying to find food.</p>	<p>No change proposed.</p> <p>The regeneration of the OPDC area will be underpinned by a comprehensive network of green infrastructure, which will need to serve the needs of both people and nature.</p> <p>All proposals will need to ensure at least a net gain in biodiversity and proposals for new public open spaces will need to be accompanied by a management plan setting out how of areas of biodiversity will be maintained and managed in the longer term.</p> <p>Proposals will also be required to undertake an Urban Greening Factor (UGF) assessment in order to optimise urban greening within development.</p>	N	

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109	Local Resident	Sarah	Johnson		7		General	Delay or withdraw the plan			I cannot see why this plan has to be accepted in its present form. There should be no rush and it should be completely reconsidered. If the pandemic has taught us anything it is that our relationship with nature should be rethought.	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
110	Land owner	Laura	Elias	SEGRO	1		General	General			SEGRO is a major owner and developer of industrial land within London. Its portfolio includes a number of sites within the OPDC area, to the extent that SEGRO is the largest owner and developer of industrial space in Park Royal. Two of SEGRO's industrial land holdings, Victoria Industrial Estate and Westway Estate, are specifically identified as major regeneration sites within the Old Oak area. On behalf of SEGRO, CBRE has reviewed the content and evidence base to the proposed modifications. Our key observations and comments are summarised below.	Noted.	N	
110	Land owner	Laura	Elias	SEGRO	2		Places		P9		<p>Land Uses in 'North Acton and Acton Wells' Sub Area (Policy P9)</p> <p>Under the description of appropriate land uses in this sub area, the modifications propose to delete 'B1, B2 and B8 uses' and replaces this with 'class E'. Such a change would indicate that B2 and B8 uses are not appropriate uses in the area. This is at odds with both the site allocation for Victoria Industrial Estate, which includes over 6,500 sqm of industrial space, and the overall approach of the plan to ensure that industrial space lost as part of the area's regeneration is replaced within new development.</p> <p>As well as not being consistent with other parts of the plan, this change to the policy wording would prejudice SEGRO's ability to offer its existing customers space on the redeveloped Victoria Industrial Estate site, which could frustrate the delivery of new development at this site.</p> <p>We understand that this is not the OPDC's intention as the stated reason for this modification is to respond to the new Use Classes Order. However, whilst B1 (office, R&D and light industrial) has changed to E, classes B2 and B8 remain unaltered in the new use class order, so there is no reason for these to be deleted in the plan.</p> <p>In conclusion, we object to this proposed modification and request that references to use classes B2 and B8 are not removed from Policy P9 to ensure that these uses do form part of the mix of land uses supported in North Acton.</p>	Change proposed. The deletion of B2 and B8 was erroneous and these will be re-instated in the Local Plan.	Y	110/2

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110	Land owner	Laura	Elias	SEGRO	3		Town Centre and Community Uses		TCC2		<p>Vibrancy (Policy TCC2)</p> <p>Policy TCC3 of the submission version of the plan protected A-Class uses, with the exception of A4 which is covered by TCC7. The purpose and justification for this policy was to meet identified needs for retail space.</p> <p>Policy TCC3 is proposed to be deleted, as Class A has been removed from the Use Classes Order. Shops and eating establishments (previously A1 and A3) are now in Class E and takeaways (previously A5) is Sui Generis. A new policy test is simultaneously proposed to be added to Policy TCC2(c) which protects existing 'town centre uses'. The Local Plan's definition of town centre uses is as follows:</p> <ul style="list-style-type: none"> • "uses within Class E (see separate definition) • other appropriate uses where they serve visiting members of the public such as other retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and recreation uses (including cinemas, bars and pubs, nightclubs, casinos and bingo halls); and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). <p>They typically need to be sited in locations that are well connected to public transport and active travel networks and are able to provide active ground floor frontages onto streets and spaces".</p> <p>The protection provided by Policy TCC2(c) is therefore far wider ranging than the previous Policy TCC3, which was underpinned by evidence of retail need (and not evidence of need for other cultural, leisure, tourism facilities). In the absence of evidence of need for other cultural, leisure, tourism facilities falling within the definition of 'town centre uses', Policy TCC2(c) is not justified in the context of paragraph 35 of the NPPF.</p>	<p>Change proposed.</p> <p>It is proposed that the policy is amended to reference Use Class E uses only, and that re-provision of existing E-Class uses will be considered against the targets for housing and economic floorspace respectively.</p> <p>Protection of sports and leisure facilities it already dealt with through policy TCC5 and protection of cultural space is dealt with through Policy TCC4 and so the wider definition of town centre uses was not as effective as it duplicated policy requirements elsewhere in the town centres chapter.</p>	Y	110/3
110	Land owner	Laura	Elias	SEGRO	4		Town Centre and Community Uses		TCC2		<p>Further, the protection of uses not previously covered by policy has not been properly tested as part of the plan making process. The protection of existing hotels for instance may frustrate the delivery of allocated development sites, such as Victoria Industrial Estate which accommodates a Travelodge currently. This site lies outside of the existing/emerging town centre boundaries and the primary objectives for its redevelopment are the delivery of housing and industrial capacity. The impacts of protecting hotel space on this site, and possibly others in the OPDC area, is untested and the effects may jeopardise proper implementation of the plan.</p>	<p>Change proposed.</p> <p>It is proposed that the policy is amended to reference Use Class E uses only, and that re-provision of existing E-Class uses will be considered against the targets for housing and economic floorspace respectively.</p> <p>Protection of sports and leisure facilities it already dealt with through policy TCC5 and protection of cultural space is dealt with through Policy TCC4 and so the wider definition of town centre uses was not as effective as it duplicated policy requirements elsewhere in the town centres chapter.</p>	Y	110/3
110	Land owner	Laura	Elias	SEGRO	5		Town Centre and Community Uses		TCC2		<p>We therefore consider that Policy TCC2(c) is not effective in the context of paragraph 35 of the NPPF.</p> <p>In conclusion, we object to the proposed policy TCC2(c) which protects all 'town centre uses'. Alternative solutions which might better meet the soundness tests might include retaining a protection of 'retail' uses, without specifying a use class. Or if it is essential to include a planning use class, protecting class E uses within town centre boundaries. We believe such alterations would better reflect the original intent of the policy and the evidence that supports it.</p>	<p>Change proposed.</p> <p>It is proposed that the policy is amended to reference Use Class E uses only, and that re-provision of existing E-Class uses will be considered against the targets for housing and economic floorspace respectively.</p> <p>Protection of sports and leisure facilities it already dealt with through policy TCC5 and protection of cultural space is dealt with through Policy TCC4 and so the wider definition of town centre uses was not as effective as it duplicated policy requirements elsewhere in the town centres chapter.</p>	Y	110/3

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111	Local Resident	Sheela	Selvajothy		1		General	Delay or withdraw the plan			Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works better for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
111	Local Resident	Sheela	Selvajothy		2		General	Support for community group comments			We support Wells House Road and other Old Oak/Park Royal residents who are suffering enormous hardships and negative impacts because of the construction of HS2. They will live through over a decade in the centre of the largest construction site in the UK. We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.	<p>Noted. Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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111	Local Resident	Sheela	Selvajothy		3		General	Delay or withdraw the plan			<p>2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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111	Local Resident	Sheela	Selvajothy		4		General	Extent of changes			The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
111	Local Resident	Sheela	Selvajothy		5		Strategic Policies		SP7		OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	
111	Local Resident	Sheela	Selvajothy		6		Strategic Policies		SP7		The LTNS have added even more to the heavy congestion and already over pollution happening on the surrounding A40 areas which in turn is in breach of the climate change policy.	No change proposed. The Low Traffic Neighbourhoods are not part of the Local Plan that was amended. OPDC is not the highways authority for the area. Any proposals developed within OPDC will need to consider the impact on the strategic road network - such as the A40 - and mitigate any impacts.	N	

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111	Local Resident	Sheela	Selvajothy		7		Strategic Policies		SP7		The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2	No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Acton station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.	N	
111	Local Resident	Sheela	Selvajothy		8		Strategic Policies		SP7		High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport. Policy T6 prevents new residents from applying for parking permits for CPZs in neighbouring streets.	N	
111	Local Resident	Sheela	Selvajothy		9		Strategic Policies		SP9		High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners.	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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111	Local Resident	Sheela	Selvajothy		10		General	Delay or withdraw the plan			We would ask for the plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	
111	Local Resident	Sheela	Selvajothy		11		Strategic Policies		SP6		<p>The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a</p>	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	

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111	Local Resident	Sheela	Selvajothy		12		Places		P8		Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable.	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	
111	Local Resident	Sheela	Selvajothy		13		Strategic Policies		SP9		These plans are contrary to any desire for community cohesion and out of character with West London	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that developments delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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111	Local Resident	Sheela	Selvajothy		14		Strategic Policies		SP9		Having seen : https://www.bbc.co.uk/news/world-us-canada-57606232 the Miami apartment collapsing on social media it is very worrying that the HS2 tunnelling and the weight of each building that has been built and those going to be built. It is important to find out exactly what happened, and what it might mean for similar buildings in Miami and around the world	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	
111	Local Resident	Sheela	Selvajothy		15		Strategic Policies		SP9		These plans cannot be concrete neither considered water tight in any case and we urge you as the inspector to ensure these developers plans allow for fire engines to get close enough to the buildings, and where occupants would be evacuated to, given that the towers are packed closely together. All these years I have not seen a fire drill from top to bottom of these high rise buildings and if a fire engine has a long enough expandable ladder to evacuate people from the top most floor. North Acton is so congested where are people going to gather in case of fire or a disaster should happen?	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	
111	Local Resident	Sheela	Selvajothy		16		Strategic Policies		SP9		WARA residents living closer to A40 use North Acton tube station too and these high rises are overwhelming and monstrous overlooking our homes.	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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111	Local Resident	Sheela	Selvajothy		17		Design		D5		These plans should not go ahead as there no provisions made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts.	<p>No change proposed.</p> <p>The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic.</p> <p>HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction.</p>	N	
112	Local Resident	Smita	Dave		1		General	Support for community group comments			I am writing both as a resident of LBHF and as a committee member/trustee of Friends of Wormwood Scrubs. With regard to the latter I fully support the letter sent by Sir Stephen Waley-Cohen on behalf of the Friends of Wormwood Scrubs	Noted.	N	
112	Local Resident	Smita	Dave		2		Strategic Policies		SP9		<p>It purports to be much the same as before but there are significant changes and especially in the developments all around us without due regard for scale, harmony and good design that might enhance our urban environment - indeed it represents the worst of development generally. This is not to say we do not support development of any sort - it is necessary - but surely there needs to be a complete review of what should be at the heart of any development - sustainability, space, light and accommodation that provides decent living accommodation - not just luxury flats for sale here and abroad and for investment but for local people.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	

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112	Local Resident	Smita	Dave		3		Strategic Policies		SP9		<p>This is a chance to reset development and bring it to back to a human scale with a typology that may be dense but still has public amenity spaces, children's playgrounds, parks and green spaces as well as other amenities necessary for such an increase in the number of people living or moving here.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p>	N	

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112	Local Resident	Smita	Dave		4		Places		P10C5		<p>MM/PS2/OPDC/P10C5/1 proposes an incredibly high density development at the end of Mitre Way, close to Wormwood Scrubs and Little Wormwood Scrubs. This development is wholly inappropriate for our local environment and there appears to be a serious lack of thought of good design that respects local residents, local parks and indeed future occupiers of these tall structures themselves. Vague references to tall structures of 'architectural merit' do little to reassure anyone having seen the quality of many such clusters built to date with the exception of just a few. See comments in item 1 above re typology and humanity.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p>	N	

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112	Local Resident	Smita	Dave		5		Places		P7		The vision of tall clusters from White City to North Acton and Ealing has been imposed by a previous plan and is no longer relevant in these post pandemic times which has and will continue to see a change of pattern in travelling and commuting as well as working	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
112	Local Resident	Smita	Dave		6		Places		P10C5		Additionally no account has been taken of existing local road network - how will the current situation at North Pole Road and its junction with Wood Lane and Scrubs Lane cope with additional traffic - it is already incredibly congested.	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. The junction of Scrubs Lane, Wood Lane and North Pole Road is located just outside the OPDC Local Plan boundary and OPDC is therefore not planning for transport improvements at this location.	N	
112	Local Resident	Smita	Dave		7		Places		P12		There is a serious lack of amenity spaces generally in the modified draft plan. There are just two vague references to "local park searches" which does not inspire confidence. Reliance on Wormwood Scrubs for amenity space should NOT be allowed as it cannot possibly sustain such a massive increase in footfall. The Scrubs is a precious lung in this dense urban environment, just 4km in its perimeter and which sustains many users including sports, walkers, bird watchers etc. It needs to be protected rather than exploited within the OPDC. Last year saw a massive increase in footfall in the lockdown as well as much damage by current and ongoing HS2 works. It is vital to ensure that this green space for sports and wilderness is preserved and protected from further damage. References in the OPDC draft plan to 'integrating green spaces' and 'providing access to nature' sound equally vague and again we need a vision - a good sensible overall vision and masterplan that incorporates sustainability, buildings at a scale that is right in this context and creating an environment that is fit for purpose.	<p>No change proposed.</p> <p>As a Metropolitan Park, Wormwood Scrubs will be a valuable asset for those living, working and visiting Old Oak, as it is for entire West London region and further afield.</p> <p>However, development identified within the Local Plan will not rely on Wormwood Scrubs or any other existing green spaces. The Local Plan requires proposals to ensure that 30% of developable land outside of SIL is delivered as publicly accessible open space. This includes the delivery of two new Local Parks, of a minimum 2 ha in size, and a series small public open spaces serving a variety of functions.</p>	N	

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112	Local Resident	Smita	Dave		8		Strategic Policies		SP9		<p>There is an element of randomness with varying heights and materials of these tall structures - wholly inappropriate for this area - this not only destroys the skyline but creates chaos visually - not much can be done with the planning framework laid out to date which saw the rise of clusters of tall buildings in White City and North Acton and to the north of the Scrubs. There appears to have been inadequate design guidance for these tall buildings - most consultations mention tall buildings of architectural merit - but clearly this is undefined. The watercolour sketch for One Portal Way for instance shows the sky view punctured by 19+ storeys among 10 storey buildings. The sky view from the green is not beautiful but jarring with angular tower blocks. Many are not against tall buildings as such by the way but right place right context. It would be very sad for us all to keep losing our skies.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Tall building locations have been defined following a design-led and plan-led approach. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
112	Local Resident	Smita	Dave		9		Strategic Policies		SP9		<p>At a time when we might all be finally recognising that tall buildings are not the type of buildings that Londoners might want in 2021 surely now is the time for a complete overhaul. We need a good urban masterplan for this OPDC area - one that truly attempts to put quality of living and urban environment at the heart of the communities. We need an independent panel drawn from experts in urban/architectural and other fields that is able to oversee good design and lasting legacy.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Major development proposals are reviewed by OPDC's Place Review Group which comprises leading practitioners across multiple built environment disciplines.</p>	N	
113	Local Resident	Sophie	Cogan		1		Places		P12		<p>The area around wormwood scrubs is already heavily congested with traffic and HS2 construction work which will only worsen with the new construction and then vehicles servicing the buildings. This will produce high levels of pollution and poor air quality</p>	<p>No change proposed. The Local Plan includes proposals to address congestion, such as policies on reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. The Local Plan also sets a range of policies to support a mode shift away from private vehicles to reduce congestion and pollution, from new and enhanced stations, to measures to support walking and cycling, to requiring EV charge points and a bus strategy. All these measures will reduce transport pressure and improve air quality. Policy EU4 also includes a series of measures to secure an overall improvement in air quality. The Ultra Low Emission Zone is due to expand across the OPDC area in October 2021 requiring tighter emission standards from vehicles, which will contribute to an improvement in air quality in the short term.</p>	N	

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113	Local Resident	Sophie	Cogan		2		Places		P12		<p>Wormwood scrubs is a semi-rural area of open land and green space, highly valued by Londoners who may not have access to gardens and birds and other wildlife. The new high-rise buildings will have an adverse impact on views from the scrubs undermining the 'more wild than tamed' nature of the scrubs and compromising its ability to soak up carbon emissions.</p>	<p>No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The assessment of the impacts of tall buildings undertaken as part of the Scrubs Lane Development Framework update has found that there is no increased impact on Wormwood Scrubs as a result of the proposed modifications.</p>	N	
113	Local Resident	Sophie	Cogan		3		Places		P1		<p>The plan is not well thought through as the majority of users of the new station will be using it to change between HS2 and the Elizabeth line rather than local residents disembarking as the vehicular and pedestrian access to the new station will be very poor.</p>	<p>No change proposed. The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in its own right, similar to Kings Cross. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. The station proposals include a new surface transport interchange and cycle hub to support journeys to and from the station by active travel and public transport, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area.</p>	N	
114	Local Resident	Sophie	Neville		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to embed requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	

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114	Local Resident	Sophie	Neville		2		Design		D3, D4		We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The principle for delivering high quality high density mixed use development in areas outside of SIL has not been modified as part of the proposed main modifications. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
114	Local Resident	Sophie	Neville		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. Surely, London office and shop space will soon become available to meet attractive housing requirements. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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114	Local Resident	Sophie	Neville		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
114	Local Resident	Sophie	Neville		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
114	Local Resident	Sophie	Neville		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
114	Local Resident	Sophie	Neville		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Acton station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	

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114	Local Resident	Sophie	Neville		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.</p>	N	
114	Local Resident	Sophie	Neville		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
114	Local Resident	Sophie	Neville		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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114	Local Resident	Sophie	Neville		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
114	Local Resident	Sophie	Neville		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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114	Local Resident	Sophie	Neville		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
114	Local Resident	Sophie	Neville		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
115	Land owner	Abigail	Heraty	Splendid Hospitality Group	1		General	General			<p>Splendid Hospitality Group (SHG) is one of the UK's fastest growing privately owned hotel groups, within the SHG ownership is the Hilton London Bankside, the Grand Hotel York and Hotel Indigo Edinburgh.</p> <p>SHG is also the long leaseholder of the land located to the south of Coronation Road / west of Rainsford Road, Coronation Road, within the OPDC. The site has a hotel permission (ref: Ref: 12/2861) that was granted in 2013 and expired in 2016. SHG are currently exploring opportunities to enhance the site that will promote long term investment in the Park Royal area, in accordance with the OPDC draft Local Plan. This opportunity will be progressed over the medium term alongside a substantive programme of stakeholder engagement and this process will inform our decision as we proceed. However, it is timely to engage with the plan making process now and we therefore make the initial observations below.</p> <p>The first part of this representation provides the relevant background information in relation to the Site, before sequentially providing our observations in relation to the currently drafted Planning Policies of the above mentioned documents.</p> <p>We look forward to working with the OPDC so that the plan can facilitate sustainable development, respond positively to the Government's agenda for growth, and accords with tests of 'soundness' as set out within the National Planning Policy Framework (NPPF) (2019).</p>	<p>Noted.</p>	N	

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115	Land owner	Abigail	Heraty	Splendid Hospitality Group	2		Places		P4C1		<p>The Site</p> <p>The site is the land located to the south of Coronation Road / west of Rainsford Road, Coronation Road, London, NW10, as illustrated below:</p> <p>NB: map of site depicted</p> <p>The site is located along Coronation Road, lies to the north of the A40 Western Avenue and is bounded by London Underground and Network Rail lines to the south. To the north of the site is the new perimeter road of Lakeside Drive leading to the Fairview residential development. Located at the northwest is the Diageo headquarters office development.</p> <p>The site sits across the London Borough of Ealing and the London Borough of Brent. 24ha (44%) of the site is located in Ealing with 0.31ha (56%) being in Brent.</p> <p>The site has good public transportation accessibility levels (PTAL) ranging between 3 – 4 and is within walking distance to Hanger Lane and Park Royal underground services.</p> <p>As mentioned earlier, the site has an existing permission (Ref: 12/2861) to develop an 11 storey building (including lower ground floor) with basement level to provide 229 bed hotel (Class C1) including function / event space, conference suite, bar and dining facilities together with associated car parking, cycle parking, servicing, retail kiosk (Class A1 or A3), coach drop-off lay-by and dedicated coach parking area on Lakeside Drive.</p> <p>To note, since the hotel permission was granted in March 2013, the surrounding context has significantly changed with the First Central Permission (Ref: 17/0076/FUMOPDC) granted in 2017, now known as the Fairview development. Permission was granted for a 5 to 27 storey development of 807 residential homes and 1354sq.m of retail/employment/community floor space. The tallest element is located on the south-eastern corner adjacent to the junction between Lakeside Drive, Rainsford Road and Coronation Road, adjacent to the SHG site. Construction is well underway and completion is expected end of 2021.</p> <p>Additionally, the site is located within the Brewery Cluster Site Allocation, in the draft OPDC Local Plan Policy P4C1. The site allocation supports residential, commercial and 'walk to' retail and social infrastructure use.</p> <p>The site allocation is further illustrated within Figure 4.15 of Table of figure modifications (ref: Figure/PS2/OPDC/4.15), as set out below:</p> <p>NB Figure 4.15 depicting Brewery Cluster depicted</p>	Noted.	N	
115	Land owner	Abigail	Heraty	Splendid Hospitality Group	3		Places		P4C1		<p>Representations to Main Modifications to the draft Local Plan</p> <p>We welcome and fully support OPDC's vision for Brewery Cluster of creating high quality and legible entry point into Park Royal. New and improved walking and cycling routes, along with a concentration of local services set within an attractive public realm, will provide an area of focus and vibrancy for the new and existing residential and employment uses in the area, as set out within Policy P4C1.</p> <p>We also support Policy P4C1 strategy for building heights as set out in Part K) by stating 'Contributing to a variety of building heights which respond to the context, with tall buildings and associated new publicly accessible open space focussed along Coronation Road'.</p>	Noted.	N	

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115	Land owner	Abigail	Heraty	Splendid Hospitality Group	4		Places		P4C1		<p>However, the revised Figure 3.15 Sensitive locations and tall buildings of the Table of figure modifications (Ref: MINOR/PS/Q1b Figure/PS2/OPDC/3.15) states the Figure is adjusted to include the whole of Brewery Cluster as an area where tall buildings as appropriate, as set out below:</p> <p>NB Figure 3.15 depicted</p> <p>This Figure is also duplicated within Tall Buildings Statement Update Local Plan Supporting Study in Figure 2.2 Map of locations where tall buildings are an appropriate form of development. However, this adjustment does not reflect the whole of Brewery Cluster Site Allocation as set out Figure 4.15 of Table of figure modifications (ref: Figure/PS2/OPDC/4.15) and accordingly inadvertently excludes SHG site as an appropriate location for tall buildings.</p> <p>London Plan Policy D9 requires the Local Planning Authority to define what is considered a tall building and where appropriate locations for tall buildings are. In accordance with Policy D9, the OPDC defines tall buildings as 15 storeys or 48 metres above ground level and Figure 3.15 defines the locations appropriate for tall buildings. Given the SHG site sits within Brewery Cluster allocation, which is defined as an area appropriate for tall buildings (15 storeys +) and is further supported by Policy P4C1 Part K), which guides the tall buildings of Brewery Cluster along Coronation Road, we therefore propose Figure 3.15 of Table of figure modifications (Ref: MINOR/PS/Q1b Figure/PS2/OPDC/3.15) and Figure 2.2 within Tall Buildings Statement Update Local Plan Supporting Study is updated to include SHG site to reflect the Brewery Cluster site allocation as an appropriate location for tall buildings.</p> <p>The SHG site is located within a sustainable location, with good access to public transportation. The SHG site has a precedent of height with the hotel permission permitted at 11 storeys, which height was relevant to its time. Additionally, the SHG site is located within an emerging context of tall buildings with the construction of the Fairview residential development at 27 storeys. Therefore, in accordance with NPPF (2019), to avoid precluding the site from optimising its potential through making best use of brownfield land in sustainable location, which will encourage positive growth through the principles of sustainable development, we recommend the SHG site should be included within Brewery Cluster of Figure 2.2 and Figure 4.15 as an appropriate location for tall buildings.</p> <p>Thank you for giving us the opportunity to comment on the Main Modifications to the draft Local Plan. We would be grateful for confirmation of receipt of these representations and look forward to working with you throughout the Local Plan progress.</p>	<p>Change proposed.</p> <p>Policy P4C1(k) provides guidance for development to contribute to "a variety of building heights which respond to the context, with tall buildings and associated new publicly accessible open space focussed along Coronation Road;"</p> <p>Proposed modification Figure/PS2/OPDC/3.15 proposed to adjust the area where tall buildings are appropriate for the Brewery Cluster to reflect the whole cluster and clarify the spatial implementation of policy P4C1(k).</p> <p>To further clarify the implementation of this policy guidance, OPDC proposes to further modify Local Plan figure 3.15 and Tall Building Statement Update figure 2.2 to depict the whole Brewery Cluster as shown in figure 4.15.</p>	Y	115/4
116	Statutory Consultee	Mark	Furnish	Sport England	1		Town Centre and Community Uses		TCC5		<p>Sport England has reviewed the Modifications and welcome the following:</p> <p>. The various amendments to the text changing 'sports pitches' to 'playing field' when discussing Wormwood Scrubs and Policy TCC5. The change in terminology aligns with the wording used in the National Planning Policy Framework, Legislation and Sport England's Policy. It also provides clarity that it is not just the playing pitches, but the wider playing field, that provides opportunities for sport and physical activity.</p>	Noted.	N	

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116	Statutory Consultee	Mark	Furnish	Sport England	2		Town Centre and Community Uses		TCC1		Sport England has reviewed the Modifications and welcome the following: . The numerous changes from 'employment' and 'business' uses to uses falling within Use Class E. These modifications ensures that indoor sport facilities would be considered in certain areas when previously that may not have been the case thereby providing the opportunity for sport facilities to be included in more accessible areas than arguably the previous wording would allow.	Noted.	N	
116	Statutory Consultee	Mark	Furnish	Sport England	3		Strategic Policies		SP7		Sport England has reviewed the Modifications and welcome the following: . The many modifications that promote walking and cycling. Active travel is key in reducing inactivity therefore Sport England supports Local Plans that ensures the necessary infrastructure is in place to facilitate convenient and safe walking and cycling.	Noted.	N	
117	Community / interest group	Henry Peterson		St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	1		General	General			These representations have been prepared by the Old Oak Neighbourhood Forum (OONF) and the St Quintin and Woodlands Neighbourhood Forum (StQW). They follow joint meetings of OONF and the Grand Union Alliance held monthly in 2020 and 2021, and meetings of the StQW Forum discussing that part of the PSMDLP that makes proposals for Scrubs Lane and land in the east of the OPDC area. OONF and StQW have followed closely the preparation of the OPDFC Draft Local Plan since 2015. Both bodies made written and oral submissions at the EIP hearings in 2019 on the Regulation 19.2 version of the Draft, prior to the suspension of the examination. Both have continued in 2020 and 2021 to attend OPDC and HS2 consultations held online, and to submit responses on individual HS2 Section 17 applications, and on planning applications in the Old Oak area as submitted to OPDC and to LB Ealing for determination. These representations are in two parts: Part 1 addresses what we see as key points in terms of the 'soundness' of the PSMDLP and its supporting documents. Part 2 (to follow) covers detailed main and minor modifications in the 'tracked' version of the PSMDLP, the OPDC schedule of modifications, and a number of the supporting documents. It also identifies further modifications seen as necessary to remedy lack of soundness of the Draft Plan – were this route to continue onwards to the stage of Local Plan adoption.	Noted.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	2		General	General			<p>Having scrutinised the PSMDLP documentation and undertaken the preparation of these representations, our conclusion is that there is no way of making the Draft Plan sound through a process of further modification during its resumed examination. This is a consequence of</p> <ul style="list-style-type: none"> • the scale of changes proposed to be made, which are at a strategic spatial level. • The time that has elapsed since the 2018 submission of the 19.2 Draft Local Plan and the fact that the Draft Local Plan is being assessed against the 2012 NPPF, now nearly a decade out of date. • insufficient justification for the changes and modifications, and of evidence for their appropriateness and effectiveness • lack of adequate OPDC member oversight of preparation of the modifications • no evidence that the Duty to Cooperate has been met since 2018, and some evidence to the contrary • a public consultation process framed by OPDC as the majority of the local plan remains the same whereas the combination of entirely new proposals and the loss of key elements from the 2018 Draft Local Plan are in reality fundamental to the future of Old Oak. • lack of compliance with national policy, the 2012 NPPF and the 2021 London Plan • failure to meet the requirements of the Planning and Compulsory Purchase Act 2004, given the construction of this Act and its separation of the stages of 'preparation' and 'examination' of a Draft Local Plan. 	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' detailed comments.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	3		General	Local Plan should not have been submitted			<p>We also believe that OPDC should never have submitted the 19.2 version of the Draft Local Plan to the Secretary of State on 4th October 2018. As has been revealed in early 2021 by the London Assembly Budget and Performance Committee, OPDC knew at this time that Cargiant as major landowner no longer supported the Plan's proposals. The timings in this sequence of events are explained in the Budget and Performance Committee's report at pages 10 and 11, including the following paragraphs:</p> <p>Despite being made responsible for the delivery of over a third of the new homes included in the plan, it has emerged that at the time the bid was submitted there was clear evidence that Car Giant had no appetite to develop its land in this way. On 21 September 2018, just 11 days after the HIF bid was submitted by the OPDC, Car Giant wrote to the OPDC to inform it that they were formally objecting to the OPDC HIF bid. In the Budget and Performance Committee meeting on 14 October 2020, David Lunts, Interim Chief Executive Officer for the OPDC confirmed that "it was, frankly, an error for the OPDC at the time [of the HIF bid] to claim that Car Giant was still supportive when clearly it was no longer supportive."</p> <p>References to relevant documents, including an important letter from Cargiant to OPDC, are provided in the B&P Committee report. Pages 16 and 17 of this representation give more details.</p> <p>We believe that the 19.2 version of the Local Plan should not have been submitted to the Secretary of State. Section 20(2) of the PCPA specifically states that the LPA must not submit the plan unless they think it is ready for independent examination. OPDC knew at the time of the OPDC Board meeting on 28th September (which approved the 19.2 Local Plan for submission) that this draft version did not have support from the key landowner. Yet this is not stated in the report to that 28th September Board meeting.</p> <p>This sequence of events did not emerge during the 2019 EIP hearings. It was only after the Assembly's Budget and Performance Committee began its own investigation and in September 2019 used its statutory powers to obtain release by OPDC of the HIF bid and MHCLG conditions, that the details began to become clear.</p>	No change proposed. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. Thereby meeting the legal requirements. Cargiant's objections to the HIF bid, were, at that time on the basis of the assumed accelerated delivery of development from 2022 on Cargiant land in advance of them having found a satisfactory relocation site. Their objection to the HIF bid in September 2018 was not considered to undermine the effectiveness of the Local Plan, which at submission had the Cargiant sites being delivered in years 5-20, or years 2023-2038.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	4		General	Extent of changes			Regardless of this question of whether the 19.2 Draft Local Plan should ever have been submitted (and why it was not swiftly withdrawn in late 2018) we also believe that adoption of the proposed modified Draft Local Plan will not provide for a sustainable and successful future for the Old Oak area. The 2019 change of plan by the major landowner has had many more repercussions than the removal of two major sites (such as the lack of any vehicle access to the eastern end of OOC station). These repercussions have become apparent in the period since 2019, and in our view make a 'modification' process an unrealistic way forward for the Draft Local Plan as submitted.	No change proposed. The proposed modifications will continue to enable the Local Plan to support the delivery of sustainable high quality development in the OPDC area. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	5		General	Delay or withdraw the plan			In light of a forecast opening date for Old Oak Common Station of 2029-2033, we see no good reason for completing an examination of a Draft Plan which was seriously flawed from the start. A new Draft Local Plan, which takes account of the 2021 London Plan, changes to the NPPF, the Planning for the Future White Paper, and the impact on London of a continuing pandemic, would seem a far more rational way of proceeding as of mid 2021.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area. The proposed modifications are considered to be in general conformity with the 2021 London Plan. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to embed requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	6		General	General			PART 1 THE TESTS OF SOUNDNESS In terms of major modifications incorporated in the PSMDLP, and the reasons why we consider the resultant document to fail several of the tests for soundness, we set out our reasoning below. Each of the four NPPF tests for soundness (as per the 2012 version) is examined in turn.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' detailed comments.	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	7	Strategic Policies	SP10	<p>A) Positively prepared – the plan should be 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 (our emphasis added). The Local Plan for the OPDC area has an unusual context. A specific housing target was set during preparation of the 2016 Further Alterations to the London Plan. In previous representations we have questioned the evidence base for this target. Identifying the area’s objectively assessed needs has always raised questions. As noted by the Inspector in his 2014 report on the FALP, in commenting on this need for revision of the London Plan This revision has been driven partly by the realisation that the population of London has grown much faster than was anticipated in the 2011 London Plan. However, the extent to which this unexpected level of growth is structural or cyclical is unknown, as is the ability of the Plan’s existing strategies and philosophy to successfully accommodate the envisaged level of growth. In light of this, a full review of the Plan will commence in 20151.</p> <p>In 2021, the lack of any sound population forecasts for London is greater than ever. A combination of Brexit and the pandemic has unleashed population movements that cannot begin to predicted at this time. The City Intelligence section of the GLA reported on May 24th 2021 Though it remains too early to reliably quantify population change since the start of the pandemic, given the balance of evidence and our understanding of the dynamics and drivers of population change in London, it is hard not to conclude that the population of London is likely to have fallen. However, the scale of such a fall is likely to be far short of the more dramatic figures reported in the press in recent months.</p> <p>This assessment post dates the 2019 EIP review of the 2018 19.2 version of the OPDC Local Plan. Even back then it was accepted that the NPPF processes that normally apply for assessing the area’s objectively assessed housing needs had not applied. The Inspector’s findings (ID34a) acknowledge that the OPDC Local Plan has ‘particular circumstances’ in this and other respects.</p> <p>Hearing session 18 held on 6th June 2019 explored issues around housing targets in the context of the OPDC’s IIA and Sustainability Appraisal. The main question at the session was over whether there had been sufficient exploration of alternative options for a spatial strategy. At ID34a paragraph 12 the Inspector has provisionally concluded that notwithstanding the reference to the guidelines for housing numbers and employment capacity being subject to testing through the local plan process, the particular circumstances of the OPDC area are such that, in practice, no reasonable alternatives in excess of the minimum can be arrived at.</p> <p>This was at the same time as when the Draft New London Plan was being examined. This examination by a panel of three inspectors involved expert written representations and intensive debate over density policies, and whether or not the 2016 London Plan density matrix should be retained. Housing targets for opportunity areas came under specific challenge as being over ambitious and unrealistic.</p> <p>As a result, the Inspectors of the London Plan concluded at paragraph 119 of their report² that: However, to ensure that targets for jobs and homes in some Opportunity Areas, particularly those that are “nascent” or “ready to grow”, are not unrealistically high and thereby lead to unsustainable forms of development, the Mayor has suggested changes to policy SD1 parts B(4) and B(6) and reasoned justification. These make it clear that boroughs should establish the capacity for growth in each Opportunity Area, and that the figures in Table 10.1 are purely indicative rather than minimum targets (paragraph 119). (our emphasis added)</p> <p>The 2021 London Plan is now in force. The housing figures in Table 2.1 on London’s Opportunity Areas are clearly headed Opportunity Area Indicative capacity for new homes and jobs. The text at page 36 refers to these as indicative guideline figures for housing and employment capacity in each area. The relevant heading in the Site Allocations table at 3.1 of the PSMDLP states The housing and commercial or industrial floorspace targets are expressed as minimums. This treatment of the 25,500 figure for Old Oak is contrary to the 2021 London Plan.</p> <p>Local people have been told in meetings with OPDC officers ‘we have no option but to meet this target’. Housing numbers shown for site allocations in the modified PSMDLP are explained as an unalterable given and not as the product of indicative targets to be tested.</p> <p>It is never made explicit by OPDC whether this ‘no option’ approach has resulted from the fact that the Development Corporation is part of the Mayoral family. We believe that had the three Boroughs been updating their own Local Plans for the relevant parts of Ealing, Brent and the northern part of Hammersmith, the outcome would have been</p>	<p>No change proposed. OPDC considers that the proposed modifications have been positively prepared based on the best available evidence at the point of drafting.</p> <p>OPDC’s housing needs evidence is set out in OPDC’s Strategic Housing Market Assessment support study. This continues to be relevant.</p> <p>In March 2020, prior to the adoption of the 2021 London Plan, the Secretary of State for Housing, Communities and Local Government (MHCLG) wrote to the Mayor of London asking him to make modifications to the London Plan. The Secretary of State HCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land. More recently, the Secretary of State for MHCLG’s Ministerial Statement (16 December 2020) regarding housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs. These Government statements point to an increased need for housing since OPDC submitted its Local Plan. Indeed, in December 2020, the Government published a revised housing need methodology which will mean that the next London Plan will need to accommodate more housing within London, places an even greater emphasis on the role of Opportunity Areas as London’s main reservoir of brownfield land in meeting these housing needs.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect on 2021 Census information and the impact of Brexit and Covid alongside requirements to support the recovery from Covid.</p> <p>The Inspector’s Revised Interim Findings on the Sustainability Appraisal (ID-34a) confirms that the requirements of the SEA/SA regulations for the consideration of Reasonable Alternatives have been met.</p> <p>Modifications have been made to the Local Plan to describe the 25,500 homes target as “indicative”. The Local Plan identifies the 19,850 homes capacity for the Local Plan period as a minimum figure. This capacity has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>The modifications have been proposed in response to the Planning Inspector’s Interim Findings and to ensure general conformity with the Mayor’s London Plan (2021) in respect of OPDC’s housing targets.</p> <p>The Mayor of London has confirmed in a Statement of Common Ground that the Local Plan is in general conformity with the London Plan (2021).</p> <p>The purpose of the wording in the HIF documentation was to confirm that the HIF bid was submitted by OPDC in its delivery function and that any assumptions about development capacity or infrastructure on particular sites (where they differ to the Local Plan) should not be relied on by developers for the purposes of any discussions with OPDC as planning authority.</p>	N
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											<p>different. Engagement with local people would have been deeper. In LBHF and LBB, we think that unrealistic London Plan targets would have been questioned, tested and modified if deemed as failing to achieve sustainable development.</p> <p>The March 2021 updated OPDC Development Capacity Study states that Plan period homes have been reduced from 20,100 homes to 19,850 homes. This study is key to OPDC aspirations for housing numbers. The Study's questionable methodology is analysed in Part 2 of these representations.</p> <p>The public perception is that OPDC Local Plan preparation has become primarily a 'numbers game' driven by Mayoral political aspirations rather than 'plan led' development objectives. The inherent conflicting tensions resulting from combining a planning authority with a 'delivery agency' within a single organisation have become all too apparent³.</p> <p>1 Report on the Examination in Public into the Further Alterations to the London Plan, Report to the Mayor M.A.Thickett, November 2014</p> <p>2 Report to the Mayor of London by Roisin Barrett BSc (Hons) MSc Dip UD Dip Hist Cons MRTPI IHBC William Fieldhouse BA (Hons) MRTPI and David Smith BA (Hons) DMS MRTPI 8th October 2019</p> <p>3 As an example, when the HIF documentation was finally published online by OPDC in early 2020 the following paragraph of legalese is provided on the web page: The HIF bid was submitted by the GLA on behalf of OPDC. It was produced by OPDC in its role as delivery agency and not as the Local Planning Authority. The assumptions made within the bid, including but not limited to those relating to affordable housing, density and viability, were not discussed or agreed with OPDC in its role as Local Planning Authority. The information contained within the bid should not therefore be used or relied upon by third parties, as being appropriate or acceptable to OPDC in its role as Local Planning Authority. This appears to be an attempt to distance OPDC planning staff from the decision of the Board to submit the 19.2 Draft Local Plan in October 2018. And also to distance OPDC from the GLA's submission of the HIF bid. Yet the Board is responsible for the Corporation's functions as planning authority and as delivery arm.</p>			

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	8		Strategic Policies		SP10		<p>During the 2019/20 period in which OPDC pursued its Western Lands strategy and prepared its modifications, time and resources were devoted to preparing 'statements of common ground' with landowners of possibly available sites. In too many cases, these locations at Channel Gate and at Scrubs Lane have no obvious suitability for 'major town centre uses' or for new housing at extreme densities. Up to date statements of common ground between OPDC and the Boroughs are notably absent from the PSMDLP documents.</p>	<p>No change proposed.</p> <p>The Western Lands programme does not form part of the Local Plan's evidence as this work relates to OPDC's delivery functions. Relevant Local Plan supporting studies have been updated and new studies have been produced to support the proposed modifications and respond to the Inspector's Interim Findings.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. This includes Channel Gate and Scrubs Lane. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p> <p>Both Channel Gate and Scrubs Lane were identified for development in the Submission Local Plan. OPDC considers that given the scale of development envisaged in these two locations (3,100 homes across Channel Gate and 3,500 homes across Scrubs Lane) both locations are suitable for town centre uses and housing at a range of densities as demonstrated in Local Plan supporting studies.</p> <p>The proposed modifications do not propose that Scrubs Lane forms part of Old Oak major town centre. 'Walk to' town centre uses are proposed at the five clusters to support this new community, add life to the street and ultimately support the delivery of Lifetime Neighbourhoods. The portion of the Old Oak major town centre within Channel Gate is required to support new communities in Channel Gate and surrounding areas. It is primarily focused within the Atlas Junction cluster. The Submission Local Plan proposed the new Atlas Junction neighbourhood town centre. This centre has now been subsumed within the Old Oak major town centre.</p> <p>OPDC considers it has met the Duty to Cooperate requirement and works closely with its stakeholders including the three Boroughs. It should be noted that the Duty to Cooperate is to cooperate but not necessarily to agree.</p> <p>OPDC Planning Committee includes four Councillors from the three Boroughs. OPDC Board includes the three leaders of the Boroughs. OPDC Planning Committee recommended to Board that the proposed modifications be submitted to the Planning Inspector. OPDC Board approved the proposed modifications for submission. The three host boroughs and RBKC have separately submitted representations as part of the main modifications consultation.</p> <p>OPDC has continued to cooperate with the relevant public bodies in the development of the proposed main modifications. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, a requested by OPDC's Planning Inspector.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	9		Strategic Policies		SP10		Local people remain concerned that one result of the last 16 months of OPDC activity has been to escalate land values on these newly identified housing sites. The same process took place in the 2013-15, when initial plans for 'Old Oak Park' were in preparation. The outcome at that time was of speculative developers acquiring sites along Scrubs Lane and seeking early planning consents.	No change proposed. OPDC's Whole Plan Viability Study and Strategic Sites Viability Assessment demonstrate that development is viable across the OPDC area. Any proposal will need to accord with relevant policies, material considerations and informed by community consultation.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	10		Strategic Policies		SP10		Post the OPDCs 2019 'change of direction' and relative stagnation in the London new build housing market, the financial viability of the stalled developments at Scrubs Lane appears to have fallen below the waterline. Hence a series of S96A/S75 applications, and fresh applications, to increase housing numbers and densities to evermore extreme levels. Construction has yet to start on any of the Scrubs Lane developments (albeit that demolition works have taken place at Mitre Yard).	No change proposed. The Covid Pandemic and resultant national lockdown resulted in a temporary reduction in new housebuilding activity. However, National Statistics from October to December 2020 show a sustained period of growth in the number of homes being built, including a 11% increase in housebuilding starts in London. Statements of Common Ground between developers and OPDC demonstrate that sites are deliverable and developable along Scrubs Lane. Development is also underway along Scrubs Lane. In accordance with policy DI3, OPDC proactively engages with stakeholders to facilitate sustainable high quality development that accords with the relevant policies and material considerations.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	11		Strategic Policies		SP1		<p>We do not see the process or outcome of OPDC Local Plan preparation from 2016-21 to be compatible to achieving sustainable development. Plan-making has become a reactive process, responding to changed circumstances (primarily the Inspector's 2019 Interim Findings and a continuing lack of commitment by Government to help with infrastructure funding). We do not see this as 'positive preparation' of a Local Plan. Nor do we accept the OPDC claims that the PSMDLP is improved spatial plan for Old Oak as compared with the 19.2 version centred on Old Oak North.</p> <p>It is worth recalling how the regeneration of Old Oak was portrayed in the 2014 FALP4, to give a perspective on the PSMDLP: Old Oak Common has significant regeneration potential for new housing and jobs and could make a major contribution to London's position as a world business centre. Public transport accessibility and availability of amenity space should support high density development which could include a cluster of tall building around the interchange.</p> <p>Does anyone in 2021 still seriously see the proposals in the PSMDLP as making a measurable new contribution to London's position as a world business centre? The 'adjacent site' to the OOC station is only partially available for development within the plan period. The once promised 'connectivity' of locations such as Scrubs Lane/Old Oak North is not going to happen, with no Overground station and no vehicular access to the eastern end of OOC station.</p> <p>4 The London Plan March 2015 page 354</p>	<p>No change proposed. OPDC considers that the Local Plan has been positively prepared, is effective and results from a justified plan-led process that will deliver sustainable development and achieve the Local Plan's Spatial Vision.</p> <p>OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>The amended infrastructure requirements set out in the proposed modifications result in a smaller infrastructure funding gap.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p> <p>A series of Statements of Common Ground alongside consultation responses from stakeholders demonstrate the proposed modifications have been positively prepared resulting in a Local Plan that OPDC considers is sound.</p> <p>OPDC considers that the proposed modifications will ensure that the OPDC area will continue to make a major contribution to West London's and the capital's economy while providing opportunities for employment and training for local people. The Old Oak Common Adjacent Station Development Site is identified to be delivered within the plan period. The Statement of Common Ground with HS2 Ltd and the Department for Transport's consultation response demonstrate support for an increased proportion of commercial floorspace on the Old Oak Common Adjacent Station Development Site and the Acton Wells sites to deliver the new commercial centre at Old Oak South and parts of the Old Oak major town centre.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has been working closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	12		Strategic Policies		SP7		<p>It is very doubtful if an Overground station at Old Oak Common Lane will materialise, given the state of TfL finances and the June 1st 2021 decision of the Secretary of State for Transport to grant TfL only a limited and conditional further 'emergency bailout). Prospects for linking OOC station to a West London Orbital Line are similarly diminished5 .</p> <p>5 https://www.telegraph.co.uk/business/2021/06/03/flagship-hs2-station-threat-sadiq-khan-shelves-vital-upgrades/</p>	No change proposed. OPDC and TfL strongly support the delivery of Old Oak Common Lane Overground station and the station has a strong business case for investment. TfL is engaged in discussions with national government, HS2, Network Rail and others in relation to funding the station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	13		Spatial Vision				<p>B) Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence In its amended text and diagrammatic maps, the PSMDLP might appear superficially to present an 'appropriate' strategy for the future of the Old Oak area. Yet from the perspective of those who already live or work there, much of OPDC's revised approach is seen as increasingly inappropriate. The PSMDLP has in effect become two Draft Local Plans. One for the northern part of Hammersmith (centred on Scrubs Lane/Hythe Road) and one for east and north Acton, along with Park Royal, in LB Ealing. These two areas of London have been separated by major rail lines and the MOL of Wormwood Scrubs since this part of the city was developed from rural fields in the 19th century. In this 2021 Draft Local Plan the two areas remain as separated as ever. The existing borough boundaries between LB Ealing, LBHF and RBKC are not the product of chance. They reflect areas of land for which lines of separation running north/south (mainly railways) date back 150 years. The original concept of the MDC was to overcome this separation, and to create a new part of London as an integrated whole. In our view, the PSMDLP no longer achieves this crucial spatial outcome for this part of London. The Mayoral OAPF published in 2015 showed a path towards this objective. But the path has not been taken. The context in 2021 is very different:</p>	<p>No change proposed. OPDC considers that the proposed modifications to the Local Plan deliver a sound and appropriate spatial strategy for the OPDC area that is fully justified through new and updated supporting studies.</p> <p>It is common for Local Plans to contain within them plans for different neighbourhoods with different land uses.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p> <p>Proposed modifications to Policy P2 regarding Old Oak North also support the delivery of ancillary services and facilities to support place-making and activate key routes to support connectivity.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	14		Strategic Policies		SP10	Table 3.1	<p>a. The 20 year 'plan period' for the PSMDLP is 2018-38 (as we understand). This timespan is not made clear on the front of the document nor in the introduction6</p> <p>6 The key table 3.1 on site allocations and housing numbers uses the headings 'over the first ten years of the plan period' and 'during the 11 to 20 years of the plan period'. This is very unclear. Years should be specified.</p>	Change proposed. OPDC's Local Plan period is stated in paragraph 3.20 supporting policy SP4. To further clarify the plan period, officers propose the plan period is stated on the front cover and referenced in the Local Plan's Introduction Chapter.	Y	117/14

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	15		Strategic Policies		SP1		<p>b. The major new rail interchange at Old Oak Common, linking HS2, the Elizabeth Line and GWR rail services is not now scheduled to be operational before 2029 -20337.</p> <p>7 This is the date range given by HS2 and in National Infrastructure Commission publications. The PSMDLP uses a timeframe of 'after 2028' which is imprecise and disingenuous in suggesting that HS2 may be operational earlier than a realistically assessed date. The Oaklands Rise development (nearing completion) is marketing apartments with the claim that OOC station is 'coming soon'.</p>	No change proposed. The date is correct and reflects the updated delivery programme of the Old Oak Common Station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	16		Strategic Policies		SP1		<p>c. The PSMDLP offers little or no 'proportionate evidence' that a supposed key 'catalyst' for new economic vitality in the form of OOC station will deliver any of the promised outcomes. When the station becomes operational, why will this have any significant impact on the locations now framed as the key areas for concentrated new housing development (North Acton, Acton Wells, Channel Gate and Scrubs Lane). Physical barriers between these locations will remain largely in place.</p>	<p>No change proposed. The delivery of Old Oak Common Station was not subject to the proposed modifications to OPDC's Local Plan and will continue to be a world-class transport super-hub, supporting the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels.</p> <p>The places of North Acton and Acton Wells, Channel Gate and Scrubs Lane will be well connected to the station and other public transport networks and active travel networks by high quality movement routes that continue to address existing barriers to movement. These connections have been amended by the proposed modifications and are recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	17		Strategic Policies		SP2		<p>d. The 'catalyst' justification for the Local Plan is not obvious. Given the constraints on development in the immediate area around this rail interchange, and without the originally planned links to two new Overground stations, it is unclear why the OOC station (a decade away) will have any significant impact on the surrounding area? How many HS2 and GWR passengers will leave the station interchange to visits 'parts of Old Oak major town centre' when these are a significant distance away? How many new residents will choose to live at Old Oak, when other Crossrail stations will open soon and with better Overground/Underground links?</p>	<p>No change proposed. Old Oak Common station, along with the improvements and investments in walking, cycling and public transport, result in a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11. This improvement in PTAL scores is the catalyst that makes the area attractive for investors.</p> <p>The Local Plan's vision for Old Oak South is for the area and HS2's Old Oak Common Station to be a destination in it's own right, similar to Kings Cross. It is expected that one-third of the 250,000 daily passengers at Old Oak Common station will alight the station and continue their journey in the OPDC area. A significant amount of the site allocations in the Local Plan are within a 15 minute walking distance from Old Oak Common station, and areas further away are accessible by bike and bus. The Old Oak Common station and adjacent station development site is proposed to form part of the Old Oak major town centre providing direct access to town centre uses. The station proposals include a new surface transport interchange and cycle hub to support this, and the Local Plan proposes upgrades to the surrounding streets for pedestrians and cyclists as well as a bus strategy to connect the station to the wider area.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	18		Places		P1		e. The OOC station will be 1km in length and will lie within LBHF. Yet there will now be no vehicle access, by bus, car or taxi, to the eastern end of station.	No change proposed. The Bus Strategy sets out the approach for servicing Old Oak Common Station, which includes several bus routes to the east - bus routes 7, 220 and 487. Taxis and drop off location has not changed and is accessible to the wider road network, including from the east of the site, from Old Oak Common Lane.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	19		Strategic Policies		SP1		f. Longstanding claims of Old Oak as a super hub, an unprecedented opportunity and one London's most accessible destinations no longer stand up to scrutiny. Other London mainline stations with onsite Overground and Underground connections can more justifiably be described in such terms.	No change proposed. The Old Oak Common station remains one of the most connected transport hubs in the UK, connecting HS2, Crossrail and the Great West Main Line. Public transport accessibility levels in Old Oak will be greatly increased with the arrival of Old Oak Common station and the other transport investments set out in the Local Plan, as shown in figures 7.10 and 7.11.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	20		Strategic Policies		SP7		g. For those living in North Hammersmith and North Kensington, the eventual opening of OOC station will result in only modest improvement to PTAL levels.	No change proposed. These areas are outside the OPDC Local Plan boundary and OPDC is therefore not planning for development delivery within these locations.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	21		Strategic Policies		SP1		h. The original OPDC vision of 'high-density transit oriented' development is no longer valid. The major sites now proposed for high density development are not close enough to public transport to meet standard definitions as 'transit-oriented locations' (with the exception of the 'Adjacent Site' – a location the southern parts of which remains safeguarded by DfT for a potential Wycombe/Chiltern line).	No change proposed. OPDC considers the proposed modifications continue to be justified and effective in delivering new and improved public transport and active travel networks. These deliver a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11) and provides an unparalleled opportunity for car-free development in high PTAL scoring areas to support transit-oriented development.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	22	Figure/PS2/OPDC/PM4	Strategic Policies		SP6		i. The modified PSMDLP document is confusing on the subject of an 'Old Oak Major Town Centre'. Three or four areas (North Acton, Acton Wells, the OOC station site, Channel Gate) are variously referred to as 'parts of a major town centre' in different sections of the document. The 'Policy Map' at Figure/PS2/OPDC/PM4 shows no town centre at Old Oak and a neighbourhood centre at North Acton (see further detail in Part 2 of these representations).	No change proposed. The proposed modifications relating to the updated location of portions of the Old Oak Major Town Centre are considered to be justified and effective. Policy SP6 defines the proposed town centre hierarchy. The Local Plan and proposed modifications are clear in the distinction between the Old Oak Major Town Centre and North Acton Neighbourhood Town Centre. Further guidance is provided for portions of the major town centre within the Places Chapter. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre. The proposed Old Oak Major Town Centre is depicted in figures 2.2, 3.7 and 10.3. Proposed town centre boundaries have been removed from the Policies Map in response to the Inspector's Question 2. Discussions on this matter was carried out at Hearing Session 14.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	23		Strategic Policies		SP6		j. It is not clear how or why 'major town centre uses' would emerge at any of these locations? They are geographically separated and seem likely to remain so, as a result of physical barriers and disincentives to movement. No 'heart of a new Old Oak' is now planned.	No change proposed. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	24		Places		P10		<p>k. The modified Plan proposes that Scrubs Lane becomes a 'place in its own right' with an intensified concentration of new housing. New claims are made for the 'connectivity' of this currently industrial street which involve infrastructure 10-20 years away. There is no acknowledgement of the fact that without an adjacent 'Old Oak Park' and new Overground station, Scrubs Lane is far less suitable an area for high-density car-free housing than was the case in the 19.2 Draft Local Plan. Yet a fifth 'cluster' with further high density housing has now been added at Mitre Way/North Pole Depot.</p>	<p>No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. These will enable people to reach a range of existing services and town centre uses in Harlesden, Kensal Green and White City.</p> <p>In addition to accessing existing services, the proposed modifications provide support for small scale walk-to town centre uses in clusters. The provision of town centre uses will provide services for both the community along Scrubs Lane and employees within Old Oak North.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>The proposed modifications to Old Oak North are recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes.</p> <p>Scrubs Lane will be within a 15 minute walk of Old Oak Common Station and served by new and enhanced bus routes connecting the area to Harlesden, White City, Old Oak Common Station, North Acton and Park Royal. OPDC's Bus Strategy Update developed by TfL defines these bus routes.</p> <p>Proposed modifications to new and improved east-west walking and cycling routes are set out connecting Scrubs Lane to Old Oak North, Old Oak Common Station, Old Oak North, Old Oak Common Lane.</p> <p>These proposals show an improvement in PTAL levels and are shown in Figures 7.10 and Figure 7.11). The Local Plan requires car free development in areas of high transport accessibility as set out in Policy T4.</p> <p>Statements of Common Ground have been signed with landowners along Scrubs Lane demonstrating deliverability of development.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	25		Strategic Policies		SP9		<p>l. In the quest to meet a housing target, the development capacity of any and every potential site is to be stretched far beyond what will make for successful and sustainable development, or the London Plan's stated policies for 'Good Growth'. Little account is being taken of how concentrations of new housing relate (or do not relate) to one another.</p>	<p>No change proposed. The proposed modifications to development capacity of new and updated development sites has been defined by a design-led and plan-led process evidenced in supporting studies. These have been developed to reflect the requirements of policies SP2 and SP9 regarding Good Growth and delivering sustainable high quality design. The Development Capacity Study Update includes the capacity information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies.</p> <p>Statements of Common Ground have been signed with each of the landowners of sites proposed to be modified demonstrating deliverability.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	26		Strategic Policies		SP9		<p>m. As a direct result of OPDC's search for sites to replace housing numbers lost at Old Oak North, changes of density and building height between existing and proposed new areas of housing will be both abrupt and extreme. This runs counter to the Government's new emphasis on 'gentle density', the outcome of the Building Better, Building Beautiful Commission, and the 2021 draft National Model Design Code and NPPF revisions.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC considers that the Local Plan is consistent with national policy and guidance. In March 2020, prior to the adoption of the 2021 London Plan, the Secretary of State for Housing, Communities and Local Government (MHCLG) wrote to the Mayor of London asking him to make modifications to the London Plan. The Secretary of State HCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land. More recently, the Secretary of State for MHCLG's Ministerial Statement (16 December 2020) regarding housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs. These Government statements point to an increased need for housing since OPDC submitted its Local Plan.</p> <p>As part of transition arrangements, OPDC's Local Plan is being assessed against the 2012 NPPF.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	27		Strategic Policies		SP9		n. The PSMDLP, as for previous versions, lacks any clear and explicit policies on housing densities for different parts of the Plan area. Such material appeared in the 2016 Regulation 18 version but not since then. Draft policy D5 on Tall Buildings and related policies in 'Place' sections of the document are worded so as to be opaque to the ordinary citizen.	<p>No change proposed. Proposed modifications to policies relating to tall buildings are considered to be appropriately clear and effective and justified. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	28		Strategic Policies		SP9		o. It is very questionable whether the PSMDLP documentation as drafted meets New London Plan policy D9 on Building Heights, as modified by the Mayor following the intervention by the Secretary of State. Those OPDC officers drafting modifications to the updated Tall Buildings Strategy do not seem to have recognised the consequences of the addition of the crucial term 'suitable' to London Plan D9 as a result of the December 2020 Direction to the Mayor (see details in Part 2 of these representations).	<p>No change proposed. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	29		Strategic Policies		SP10		p. The PSMDLP is premised on identifying new sources of funds for a £347m funding gap. The November 2020 Spending Review and March 2021 Budget announcements give no comfort that Government will invest in Old Oak beyond the HS2 station itself. The Government's 'levelling up' agenda suggests otherwise.	<p>No change proposed. OPDC considers the proposed modifications deliver an effective and deliverable Local Plan. OPDC's new and updated supporting studies including the Infrastructure Delivery Plan and Strategic Site Allocations Viability Assessment demonstrate the plan's deliverability. The infrastructure requirements to support the modified sites result in a smaller infrastructure funding gap and consequently, more certainty that sites will be brought forward for development.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	30		Strategic Policies		SP6		<p>The 2015 OAPF vision of Old Oak is seen by local people as having long been lost along the way. The 19.2 version of the Local Plan at least offered 'Old Oak Park' as a new part of London recognisable as a 'major town centre' with public transport to match. It was possible to imagine major retail and commercial activities locating at the then proposed 'Old Oak High Street', with one or more of London's cultural providers and/or universities coming into the area as at the Olympic Park.</p>	<p>No change proposed. Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>The site is in close proximity to Willesden Junction Station, future Old Oak Common Station and North Acton Station, and potentially a future overground station at Old Oak Common Lane.</p> <p>As per policies SP6, TCC4 and TCC7 OPDC will support proposals which seek to deliver new cultural quarter at Old Oak and potential catalyst uses in area.</p> <p>It should be noted that Stratford (Olympic Park) is designated as a metropolitan centre in the London Plan, with the potential future designation as an international centre. Old Oak has always been designated as a future major town centre, and was never proposed to be a metropolitan/international town centre of the scale delivered at Olympic Park.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	31		Places		P9		<p>The 'new focus' on the 'Western Lands', cited by OPDC as an 'improvement' on the 19.2 version of the Draft Plan, has not convinced a local audience as being 'an appropriate strategy'. The envisaged Channel Gate area lacks the scale, and the level of public transport access, to become a viable 'part of a major town centre'.</p>	<p>Noted. No change proposed. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is considered to be of sufficient scale to play an important part in delivering the Old Oak Major Town Centre. It should be noted that 'western lands' is not a concept within the Local Plan and instead refers to OPDC's delivery strategy being lead by OPDC's Delivery Directorate.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	32		Places		P7		<p>North Acton is seen as an area where OPDC misguidedly handed over planning powers to LB Ealing in 2015. This has led to several years of 'regeneration' at this location the results of which are viewed by many as amongst the least successful examples of urban renewal in London.</p> <p>New high density developments at North Acton, including an over-concentration of student housing and flats aimed at the 25-35 age range, has brought limited 'activation' or sense of a successful 'place' to the area. North Acton is seen with foreboding as an example of what may be imposed at Channel Gate and Scrubs Lane should the PSMDLP be allowed to proceed to adoption.</p>	<p>No change proposed. OPDC has a scheme of delegation with the London Borough of Ealing (LBE) whereby planning applications are generally determined by LB Ealing on OPDC'S behalf using OPDC's Local Plan, the 2021 London Plan and other material considerations. OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The proposed modifications for P7 and P7C1 relating to North Acton are limited and continue to seek high quality high density development.</p> <p>OPDC's Local Plan Policy H10 provides guidance for managing student housing.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	33		Strategic Policies		SP10		As a 'delivery body' which has continued to lack any significant Government funding for infrastructure, the Corporation has also had little choice but to come up with a second effort at a Local Plan which is arguably 'more deliverable'. But deliverability alone should not be used as adequate 'justification' for a set of spatial planning proposals which do not cohere into a forward looking or 'appropriate' vision for one of London's last remaining major areas for renewal.	No change proposed. The proposed modifications have been produced by OPDC's Planning Directorate fulfilling its role as a local planning authority. OPDC considers that the proposed modifications deliver an effective and deliverable Local Plan. OPDC's new and updated supporting studies including the Infrastructure Delivery Plan and Strategic Site Allocations Viability Assessment demonstrate the plan's deliverability. The infrastructure requirements to support the modified sites result in a smaller infrastructure funding gap and consequently, a more deliverable Local Plan and more certainty that sites will be brought forward for development.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	34		General	Delay or withdraw the plan			OPDC planners could not have predicted that they would be making major modifications to a Local Plan at a time when key questions are being asked on how Londoners will live, work, travel, socialise and find entertainment in future. As it is, it seems inevitable that further review of the 2021 London Plan must start shortly in order to address London Recovery issues. London TravelWatch8 has modelled a number of scenarios on the extent to which the travel patterns of Londoners will return to 'normal' after long period of change and working from home. None of these assume a more than 80% return to previous passenger levels. Passenger levels on commuter rail services have been harder hit than on buses and the Underground. 8 The-Journey-Ahead-London-TravelWatch-Report-March-2021.pdf (amazonaws.com)	No change proposed. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to embed requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	35		General	Delay or withdraw the plan			Given all the above, local people see a compelling case not to set in stone a Local Plan for Old Oak in 2021. The business case for the HS2 project, in the context of what may prove continued consequences of the pandemic on rail travel patterns, remains under very regular Parliamentary review.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area. The business case for HS2 has been approved. Delivery of HS2 infrastructure is underway. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to embed requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	36		Spatial Vision				<p>In this new and unanticipated context, and with a Draft Local Plan that already relies largely on an evidence base already three years out of date, there are strong arguments for a fresh start. All over London, minds are being turned to how London may need to change and adapt.</p> <p>Hence the timing of this attempt to adopt a Local Plan via a process of major modifications risks adoption of a Local Plan that seems likely to be regretted for decades to come. We believe that the Plan will come to be seen as a misjudged set of site allocations and policies for Old Oak, based on a 'catalyst' concept that no longer stands up to scrutiny. It will be the Borough Councils of Ealing and Hammersmith & Fulham that live with the consequences.</p>	<p>No change proposed. OPDC's evidence base continues to be up to date and where required we have developed new and updated supporting studies to inform the proposed modifications.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to embed requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	37	General	Procedural	<p>Does OPDC as a planning authority itself see the PSMDLP as 'justified'?</p> <p>The PSMDLP documentation has had remarkably little input from the decision-making bodies of the planning authority responsible for the Plan. There is minimal evidence available to the public that the Corporation's Board and Planning Committee members remain convinced of the 'vision' and outcomes promoted in the PSMDLP.</p> <p>The first response from OPDC to the Inspector's 2019 interim findings was a 13th December press release on a 'change of direction' and a 'new focus' on the 'Western Lands'9. No OPDC Board or Planning Committee meeting had preceded this announcement. For the public, it was unclear who had agreed on this revised approach, and when? A scheduled meeting of the Board on November 21st had been cancelled.</p> <p>On January 30th 2021 the OPDC Board met and agreed 'to note' the appointment of Prior and Partners, procured from the Old Oak Masterplan call-off contract, to work alongside the OPDC team and key stakeholders to support the development of the new 'Western Land' approach. The presentation given by these consultants (appointed under delegated powers) was greeted with lukewarm support by the three Borough Leaders present at this meeting as Board members.</p> <p>Subsequently the OPDC Board received updates on work to modify the Draft Local Plan at meetings as below:</p> <ul style="list-style-type: none"> • 24th June 2020 with limited discussion and a minute reading Approved a delegation to the Chief Executive Officer to authorise expenditure of up to £150,000 to support the Corporation's revised delivery strategy; noting this will take the approval limit to Western Land preparatory work to £358,000. ('preparatory work' being OPDC's chosen terminology) • 13th October 2020 which reviewed a presentation on the Local Plan from the CEO, with subsequent minutes that the Board (inter alia) Reviewed the proposed Local Plan modifications and approved these as the basis for the next stage of formal landowner and community engagement. • 12th November 2020 at which the minutes record an update from the Planning Committee stating that Progress continued to be made on the Local Plan modifications. Meetings were taking place with officers from the local boroughs and landowners. Statements of Common Ground were under discussion, with one being signed already. Other work such as studies and community events had taken place and it was expected that the draft Local Plan would be ready for approval in spring 2021. • March 4th 2021, at which meeting Board approval was sought to Agree the submission of the Post Submission Modified Draft Local Plan (Appendix A) and accompanying documents (Appendices B-Q) to the Planning Inspector. It is notable that these appendices did not include the March 5th 'covering letter' sent to the Inspector with the PSMDLP submission. <p>During the entire period September 2019 to February 2021, the OPDC Planning Committee received no reports on the Draft Local Plan. The Inspector's September 2019 interim findings were never reported to the committee. Planning Committee meetings scheduled for 11 December 2019, 11th February 2020, 16th April 2020, and 15th December 2020 were cancelled for lack of business.</p> <p>On February 23rd 2021, the OPDC Planning Committee received a report and presentation on the proposed modifications. There was a lengthy discussion on these, and what seemed to the public to be a number of valid points and concerns were raised by committee members.</p> <p>While an oral report was made to the OPDC Board on 4th March 2021, by Planning Committee Chair William Hill, there is no sign that this Planning Committee discussion led to any changes in the PSMDLP documentation. Similarly the discussion at the OPDC Board on March 4th (at which LBHF Leader Cllr Stephen Cowan voted against submission of the modifications) led to no changes or amendments.</p> <p>The fact that the OPDC Planning Committee was never invited to comment on, make input to, or to steer the process of modifications to the OPDC Local Plan has bemused and frustrated local residents. This part of the OPDC decision-making machinery involves four local councillors (2 from LBHF and 1 each from LB Brent and LB Ealing). These elected members (and the 3 Borough Leaders on the OPDC Board) are the only part of the OPDC with any democratic accountability.</p> <p>We understand that there were some 'closed briefings' of OPDC Planning Committee members during the 2019-2021 period, on the modifications. In correspondence with the current Planning Committee Chair (William Hill) we were told of such sessions being held in March, July and October 2020.</p>	<p>No change proposed. OPDC considers that the proposed modifications are justified.</p> <p>OPDC's Planning Committee have played a part in shaping the proposed modifications having been briefed throughout the development of the changes. Four Councillors from our three Local Boroughs sit on the Planning Committee.</p> <p>It should also be noted that approaches to the involvement of Planning Committees in plan making of local planning authorities vary and many are not involved in policy formulation. OPDC's Scheme of Delegation sets out that the Planning Committee deals with planning applications. The decision to approve the text of the proposed Local Plan and the decision to approve and adopt the Local Plan are matters reserved to the Board. The Planning Committee's role is an advisory one in relation to the Local Plan.</p> <p>OPDC's Board have played a part in shaping the proposed modifications having been briefed throughout the development of the changes. Updates to the Board on the progression of the modifications have been provided at public meetings within the CEO's report. A detailed update was provided to the Board at its October 2020 meeting. OPDC's Board comprises local residents, a local business and the elected leaders of our three London Boroughs. OPDC officers are always available to meet with local community groups and do so frequently.</p> <p>On 23 February 2021 OPDC's Planning Committee recommended to OPDC's Board that the proposed modifications be submitted to the Planning Inspector. On 4 March 2021 OPDC's Board approved the submission of the proposed modifications. The proposed modifications were submitted on 5 March 2021.</p> <p>OPDC's letter of submission to the Planning Inspector dated 5 March 2021 is based on the reporting and presentational material provided previously to OPDC Planning Committee and OPDC Board. The content reflects the proposed modifications which were subject to the consultation.</p> <p>OPDC has a strong record of accountability, not least to the London Assembly, which has full, statutory rights to hold OPDC to account, and regularly does so through its meetings.</p> <p>During the development of the proposed modifications and as part of the formal consultation period OPDC have undertaken significant community engagement through a variety of means.</p>	N
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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	38		General	General			<p>9 OPDC press release 13th December 2019 at https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/about-us/press-releases/new-focus-old-oak-and-park-royal-regeneration</p> <p>10 Draft minutes of October 13th OPDC Board meeting</p> <p>11 Email of 1st April 2021 from William Hill to StQW Chair Henry Peterson</p> <p>12 London Assembly Budget and Performance Committee report January 2021 at The OPDC - Undelivered plans and the financial challenges of COVID-19 (london.gov.uk)</p> <p>13 OONF/StQW/GUA Plea to the Planning Committee Feb 2021 at http://oldoakneighbourhoodforum.org/wp-content/uploads/2021/03/A-PLEA-TO-THE-OPDC-PLANNING-COMMITTEE.V4.pdf</p>			
											<p>C) Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities</p> <p>Much of the emphasis of the OPDC covering letter to the Inspector, sent with the full set of PSMDLP modifications on March 5th, is on the increased deliverability of the Western Lands strategy.</p>	<p>No change proposed. OPDC considers that the modifications are effective.</p> <p>The Western Lands programme does not form part of the Local Plan's evidence as this work relates to OPDC's delivery functions. Relevant Local Plan supporting studies have been updated and new studies have been produced to support the proposed modifications and respond to the Inspector's Interim Findings. This includes the Strategic Site Allocations Viability Assessment that demonstrates the strategic site allocations are viable for development.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	39		General	Duty to Cooperate			<p>In terms of cross-boundary strategic working, the context for the OPDC Local Plan is an unusual one. The Draft Plan has been drawn up by a development corporation with a finite lifetime. This will leave the Boroughs to inherit the long-term consequences. Should the Local Plan fail to deliver on its ambitious aspirations, it is the Borough Councils which will be addressing the consequences.</p> <p>Medium and long-term problems may manifest themselves in many ways, including housing developments with problems of high costs of maintenance and repair, social stress arising from 'car-free' high rise towers with inadequate amenities within walking distance, and models of PRS housing where service costs escalate beyond what tenants and 'intermediate' purchasers can afford to pay.</p> <p>The 19.2 version of the Draft Local Plan was supported by a September 2018 OPDC Duty to Co-operate Statement. This documented the extent and nature of regular discussions between OPDC officers and the four Boroughs (including RB Kensington & Chelsea) which currently border on the OPDC area.</p> <p>This Statement has not been updated for the 2021 submission. Our understanding is that this is not a legal requirement, given that the statutory Duty to Cooperate ceases to have force once a Draft Local Plan is submitted to the Secretary of State. As we understand, whether or not a planning authority has met this duty is normally one of the first questions which an Inspector examines. Completion of the examination and subsequent adoption would, in most circumstances, follow much more swiftly than has proved the case for the OPDC Local Plan.</p> <p>We are aware that a number of Local Plans across England have been withdrawn, or have not progressed to adoption, as a result of a failure to meet the Duty to Co-operate (City of York and Sevenoaks DC being examples).</p> <p>In the case of the OPDC PSMDLP, as a result of a 16 month suspension of the examination, the public have no idea (nor any means of finding out) whether the duty to cooperate has continued to be met adequately since September 2018.</p> <p>OPDC has claimed within the PSMDLP documentation that regular meetings with the four Boroughs have continued. No updated 'statements of common ground' between OPDC and the Boroughs have been published, these being the normal basis for examination of compliance with the duty.</p> <p>The relevant paragraphs of the 2012 NPPF (against which the PSMDLP is being examined) are at paragraphs 178-181 of this earlier version. These were expanded on in the 2014 NPPG. As we read this material, the legal requirement to show evidence of co-operation is a continuing one during the plan preparation process. We also understand that evidence of such co-operation should be made publicly available throughout the plan-making process to provide transparency.</p> <p>We do not see how it can be argued that OPDC has currently complied with this NPPF requirement?</p>	<p>Noted. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs.</p> <p>The Duty to Cooperate is required to be carried out during the preparation of the Local Plan. The preparation period completes at the point of submission. OPDC submitted its Local Plan in October 2018.</p> <p>Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, as requested by OPDC's Planning Inspector.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	40		General	Duty to Cooperate			<p>In terms of cross boundary strategic matters, the content of the PSMDLP leaves many questions unanswered or deferred beyond the life of the Plan (to use a relevant term from the 2018 NPPF). There are no realisable proposals for new road connections between East Acton and North Hammersmith (as was the case with 'Union Way' at Old Oak North in the 19.2 version).</p> <p>A proposed 'Wormwood Scrubs Street' has been trailed by OPDC in diagrammatic maps used in presentations (to the public and to OPDC Board and Planning Committee). On closer scrutiny of the PSMDLP, the essential western section of this new 'key route' is a 21+ years project. No road connections are planned to bridge the historic divide between Acton and North Hammersmith.</p> <p>For this and other reasons, we do not see that the PSMDLP as redrafted is 'effective' as a potential Local Plan for the Old Oak area. Nor is there evidence that this modified version has sufficient support from the Boroughs which will inherit the consequences of this Local Plan. We wait to see how each Borough will respond to the PSMDLP consultation. The public will not see silence or a nil response as meaning support or consent to the PSMDLP proposals.</p>	<p>No change proposed. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs, RBKC and Transport for London to define proposed modifications for cross boundary connections. It should be noted that the Duty to Cooperate is to cooperate but not necessarily to agree.</p> <p>OPDC considers the proposed modifications are effective delivering a sound Local Plan.</p> <p>The majority of the connections set out in the proposed modifications are identified to be delivered within the plan period.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These include walking and cycling connections and bus routes between Scrubs Lane and Old Oak Common Lane. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period providing an all modes connection between Scrubs Lane and Kensal Canalside Opportunity Area in RBKC.</p> <p>Proposed modifications to Policy P2 regarding Old Oak North also support the delivery of ancillary services and facilities to support place-making and activate key routes to support connectivity.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	41		General	Duty to Cooperate			<p>At the meeting of the OPDC Board on March 4th 2021, Councillor Stephen Cowan (Leader of LBHF) voted against the recommendation that the PSMDLP documents be submitted to the Inspector. He argued for further consultation with local people but was outvoted. Coupled with the fact that the two LBHF councillors on the OPDC Planning Committee abstained on a recommendation to grant planning consent to an 'optimised' planning application at North Kensington Gate (South) on January 14th 2021, these actions suggest that there is disquiet within this Borough Council on the effectiveness of the PSMDLP in terms of cross-boundary working and the Duty to Cooperate.</p>	<p>No change proposed. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs. It should be noted that the Duty to Cooperate is to cooperate but not necessarily to agree.</p> <p>On 23 February 2021 OPDC's Planning Committee recommended to OPDC's Board that the proposed modifications be submitted to the Planning Inspector. On 4 March 2021 OPDC's Board approved the submission of the proposed modifications. LBHF have separately submitted representations as part of the Main Modifications consultation. LBHF have stated within their submission that they have broad support for the plan subject to their proposed amendments. In particular they state support for the ambitious approach that the OPDC has demonstrated throughout the Plan toward health and well-being, a protected Wormwood Scrubs, healthy streets, support for low and zero carbon sustainable development, and strong future economic development.</p> <p>Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, as requested by OPDC's Planning Inspector.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	42		General	Consistency with national policy			D) Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. In terms of compliance and conformity with the 2012 NPPF and with the 2021 London Plan, we consider the PSMDLP and its supporting document to fail to meet this element of the tests for soundness in the following respects. Were the Plan to be examined against the 2018 NPPF, or the MHCLG consultation version currently being revised, there would be further issues to raise.	No change proposed. The Local Plan is consistent with national policy set out in the 2012 NPPF and the NPPG.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	43		Strategic Policies		SP9		<p>i) NPPF paragraph 15 states that All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption will be applied locally. We argue that in relation to policies on housing density (a key issue for applicants/developers and for the public) the PSMDLP includes no clear policies. A reference to acceptable densities being in a range of 300-600 hu/hectare has been added to the supporting text, as a late modification. But this leaves the policy position wholly unclear. NPPF 2012 paragraph 47 is clear that local authorities should set out their own approach to housing density to reflect local circumstances.</p> <p>In a context when the previous London Plan policy 3.2 and Density Matrix has been removed from the 2021 London Plan, it is now more essential than ever that a Local Plan for a new part of London sets clear expectations on housing densities. This the PSMDLP fails to do.</p> <p>At national level, the proposed additions to the NPPF signal a direction of travel by Government. So too does the content of the National Model Design Code with its explanation on density levels for different forms of urban and suburban building typologies (see in Part 2 of these representations). The fact that the PSMDLP is being assessed against the 2012 NPPF feels increasingly untenable, given several clear shifts in Government policy on urban design and implementing the recommendations of the Building Better Building Beautiful Commission.</p> <p>The intervention of the Secretary of State in requiring a late modification to London Plan Policy D9 on Building Heights, and the accompanying 'Direction Overview' similarly reflected a recognition by Government that the English planning system has failed in the past decade to deliver building typologies that the public in London feel they can relate to. We do not consider that the proposed modifications to the OPDC Local Plan will make it compliant with 2021 London Plan Policy D9.</p> <p>London Plan Policy D2 Infrastructure requirements for sustainable densities continues to provide guidance in the spatial development plan. This includes a requirement that densities be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).</p>	<p>No change proposed. OPDC considers the proposed modifications are consistent with national policy set out in the 2012 NPPF and the NPPG delivering a sound Local Plan.</p> <p>No change proposed. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Additionally, in March 2020, prior to the adoption of the 2021 London Plan, the Secretary of State for Housing, Communities and Local Government (MHCLG) wrote to the Mayor of London asking him to make modifications to the London Plan. The Secretary of State HCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land. More recently, the Secretary of State for MHCLG's Ministerial Statement (16 December 2020) regarding housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs. These Government statements point to an increased need for housing since OPDC submitted its Local Plan.</p> <p>To support development, the proposed modifications set out update infrastructure requirements underpinned by an updated Infrastructure Delivery Plan and the Preliminary Infrastructure Design and Costing Study.</p> <p>The Local Plan provides clear policy guidance and site allocation information for delivering high quality sustainable development. The proposed modifications to development capacity of new and updated development sites has been defined by a design-led and plan-led process evidenced in supporting studies including the Development Capacity Study (DCS) Update. The DCS methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans and updates to the NPPF.</p> <p>Statements of Common Ground have been signed with each of the landowners of sites proposed to be modified demonstrating deliverability.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	44		Strategic Policies		SP9		<p>ii) NPPF 2012 Paragraph 157 states that Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary and provide detail on form, scale, access and quantum of development where appropriate. The content of the PSMDLP appears to be deliberately evasive on the subject of housing densities, and hence on 'form' and 'scale' in terms of building heights. The evidence of decisions by the OPDC Planning Committee (and by LB Ealing on delegated applications) between 2015 and 2021 offer no reassurance that either planning authority intends to pay any heed to changes in national and London Plan policy since 2012. The PSMDLP is required (as we understand) to generally conform with the 2021 London Plan. This is not the only subject on which PSMDLP draft policies are neither clear nor unambiguous. Further examples are given in Part 2 of these representations.</p>	<p>No change proposed. OPDC considers the proposed modifications are consistent with national policy set out in the 2012 NPPF and the NPPG delivering a sound Local Plan.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The Local Plan provides clear policy guidance and site allocation information for delivering high quality sustainable development. The proposed modifications to development capacity of new and updated development sites has been defined by a design-led and plan-led process evidenced in supporting studies including the Development Capacity Study (DCS) Update. The DCS methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Planning applications are determined using the relevant policies and material considerations.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	45		General	Duty to Cooperate			<p>iii) Duty to Cooperate As noted above in the section on whether the PSMDLP documentation is 'effective', we question the adherence of the PSMDLP to the NPPF 2012 requirements in paragraphs 178, 179 and 181. The public have no evidence of Borough involvement in, or views on, the substantial changes made to the spatial plan for Old Oak, beyond brief comments made by Borough Leaders at OPDC Board and Borough councillors on the OPDC Planning Committee. These have been far from fully supportive.</p>	<p>No change proposed. OPDC considers it has met the Duty to Cooperate requirement and works closely with its stakeholders including the three Boroughs. It should be noted that the Duty to Cooperate is to cooperate but not necessarily to agree.</p> <p>OPDC Planning Committee includes four Councillors from the three Boroughs. OPDC Board includes the three leaders of the Boroughs. OPDC Planning Committee recommended to Board that the proposed modifications be submitted to the Planning Inspector. OPDC Board approved the proposed modifications for submission. LBHF have separately submitted representations as part of the main modifications consultation.</p> <p>The Duty to Cooperate is required to be carried out during the preparation of the Local Plan. The preparation period completes at the point of submission. OPDC submitted its Local Plan in October 2018. Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, a requested by OPDC's planning inspector.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	46		General	Extent of changes			<p>iv) NPPF Paragraph 158 states Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and take account of relevant market and economic signals.</p> <p>For significant sections of the PSMDLP text, we do not see this material as either 'up to date' or 'focused tightly on supporting and justifying the policies concerned'. As explained in the detailed representations in Part 2 of these representations, much of this text is made up of unjustified and generalised assertions. Material drafted for the 19.2 version of the Draft Plan has been overtaken by events, while remaining unaltered in the PSMDLP 'tracked' version. Transport infrastructure and new 'key routes' envisaged in 2018 are no longer going to happen. In Part 2 of our representations, we have identified many sections of the document where further modifications would be needed for the Plan to begin to read as coherent and accurate in the statements and justifications made in support of draft policies.</p> <p>These defects in the documentation are before any consideration of the extent to which current market and economic signals are not reflected in the PSMDLP. We accept that OPDC could not in 2018 have predicted the pandemic. Yet for people living and working in the area, progressing a plan to adoption in a context in which so much has changed adds to loss of confidence in the national planning system.</p>	<p>No change proposed. OPDC considers that the Local Plan supporting studies are appropriately up to date and the proposed modifications are sound. Where required, Local Plan supporting studies have been updated and new studies produced to inform the proposed modifications</p> <p>Regarding comments within Part 2, please refer to OPDC's responses to the St Quintin and Woodlands and Old Oak Neighbourhood Forums' detailed comments.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	47		Integrated Impact Assessment (IIA)				<p>v) Integrated Impact Assessment Addendum – Post Submission Proposed Modifications</p> <p>The PSMDLP submission includes the above document, the preparation of which was commissioned by OPDC from Arcadis UK Ltd. While this report includes much detail, its basic premise is to accept the OPDC line that the majority of the Local Plan will stay the same¹⁴.</p> <p>The Arcadis document states The modifications signify the proposed change in approach to land uses for Strategic Industrial Locations and mixed-use areas now being delivered in both Old Oak and Park Royal. Due to the high level nature of the IIA, the overall effects of the changes to the plan on the assessment, have been negligible.</p> <p>The update IIA assessment continues in this vein, in commenting on changes in the location of 'major town centres', reductions in public transport availability, and a significantly reduced road network within in the plan period. Assessment comments such as 'Although, the delivery of Union Way has been removed, the IIA score of major positive against IIA Objective 4 remains unchanged as the Policy still delivers significant connectivity improvements without Union Way' carry no credibility with those who need to move around the Old Oak area on a daily basis.</p> <p>14 OPDC consultation leaflet May 2021 as delivered to homes in the area.</p>	<p>No change proposed. OPDC considers the Integrated Impact Assessment (IIA) Addendum is legally compliant.</p> <p>The IIA (Addendum) independently assessed the proposed modifications as required by the relevant legislation and in terms of providing a best-practice approach. The IIA Addendum assessed the sustainability, health, equalities and habitats impacts at a high level that is appropriate for it's role and function. The assessment reflects that the majority of the Local Plan remains unchanged and that the modifications largely relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	48		General	Definition of Strategic Policies			<p>vi) NPPF paragraphs 156, 184 and 185 cover 'strategic' and 'non-strategic' policies in Local Plan preparation. OPDC's non-conforming approach to this NPPF distinction was raised in written submissions and was discussed at the first of the 2019 EIP hearings as Matter 1.</p> <p>The outcome was that the Inspector's subsequent list of Matters Arising included the conclusion OPDC to suggest modification to policy DI3 so as to set out a role for Neighbourhood Plans (see particularly discussion in session 16 re Stonebridge Park and Harlesden Station).</p> <p>We respectfully contend that this did not address the issue of compliance with the NPPF. The 2012 NPPF at paragraph 184 states local planning authorities should set out clearly their strategic policies for the area, and ensure an up to date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them.</p> <p>Paragraph 185 continued outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area Paragraph 21 in the 2018 NPPF repeats this requirement with different wording as 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 non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies. (our emphasis).</p> <p>OPDC's approach in the PSMDLP remains the same as at Regulation 18, 19.1 and 19.2 stage, and is to assert at 1.24 of the PSMDLP 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>Chapter 4 of the PSMDLP document is made up of the 'Place' sections of the Draft Local Plan. As stated previously we do not see how OPDC can sustain a case that The Place Policies set out the overarching direction and objectives for each place. How can dozens of place-specific policies be categorised as 'over-arching', 'strategic' and other than 'detailed' given the additional guidance on NPPF 21, as set out at NPPG 075 Reference ID: 41-075-20190509 on What is meant by strategic policies, and NPPG on Paragraph: 076 Reference ID: 41-076-20190509 on How is a strategic policy determined? How can many of the OPDC Chapter 4 policies be defined as a 'starting point' for non-strategic policies in the Local Plan, or further neighbourhood plans (following the Harlesden NP, and the draft Old Oak NP) that may come forward? Paragraph 28 of the 2018 NPPF states Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies. Many of the policies in the Place sections of the PSMDLP relate to these non-strategic elements of the Plan.</p> <p>This issue is considered further in the detailed representations in Part 2 of this document. We contend that OPDC should have taken a much more discriminating approach to the distinction between strategic and non-strategic policies if the 2012 NPPF (and subsequent versions) is to be complied with. The PSMDLP fails this clear NPPF requirement.</p>	<p>No change proposed. OPDC's definition of strategic policies is considered to be consistent with national policy.</p> <p>The proposed modifications did not amend OPDC's definition of strategic policies.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	49		Strategic Policies		SP10		<p>vii) on the housing content of the PSMDLP, we do not consider that paragraph 41, 57 and 58 of the 2012 NPPF can be said to be met. Site allocations at Table 3.1 of the PSMDLP are a list of those pieces of land on which it will (or may) prove possible to build, rather than reflecting a coherent spatial strategy of where new housing should be located in relation to town centres and neighbourhood centres, the local road network, and available public transport.</p> <p>Paragraph 2.4 of the 2021 Development Capacity Study acknowledges that only 3 suggestions came forward as a result of a call for sites. Normally this part of Local Plan preparation would give the planning authority a range of options on potential sites, which can then be assessed for their suitability and spatial relationships. We do not see the outcome of the allocation of housing sites in the PSMDLP as being the result of a coherent spatial plan, or reflecting these sub-paragraphs of NPPF paragraph 58:</p> <ul style="list-style-type: none"> • Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. • Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. • Respond to local character and history, reflecting the identity of local surroundings and material, while not preventing or discouraging appropriate innovation. <p>While the methodology undertaken in the DCS may reflect standard, practice, the outcome is unusual. As acknowledged at paragraph 2.6 Exclusions from the assessment are limited reflecting aspirations for optimising development within the OPDC area. However, there are a number of sites considered appropriate to be excluded for housing and/or economic use development.</p> <p>The sites excluded are those where development is unachievable for one of several reasons (MOL, open space, the canal, railway embankments etc). Every even faintly plausible housing site has had to be allocated for intensive development to achieve a 10 year housing target, regardless of spatial 'appropriateness' or suitability.</p>	<p>No change proposed. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs, RBKC and Transport for London to define proposed modifications for cross boundary connections. It should be noted that the Duty to Cooperate is to cooperate but not necessarily to agree.</p> <p>OPDC considers that the proposed modifications are effective and delivering a sound Local Plan.</p> <p>The majority of the connections set out in the proposed modifications are identified to be delivered within the plan period.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has been working closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These include walking and cycling connections and bus routes between Scrubs Lane and Old Oak Common Lane. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period providing an all modes connection between Scrubs Lane and Kensal Canalside Opportunity Area in RBKC.</p> <p>Proposed modifications to Policy P2 regarding Old Oak North also support the delivery of ancillary services and facilities to support place-making and activate key routes to support connectivity.</p> <p>The Industrial Land Review Addendum 2021 looked in a sequential manner at further sites appropriate for release from Strategic Industrial Location to ensure that OPDC continues to meet its 2021 London Plan housing targets and remain in general conformity. This sequential process considered the most appropriate sites based on their ability to support place-making by being close to public transport and/or being contiguous with areas already proposed for de-designation from Strategic Industrial Location.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	50		Strategic Policies		SP6		<p>viii NPPF 2012 Paragraph 161 states that LPAs in their Local Plans should assess:</p> <ul style="list-style-type: none"> • The role and functions of town centres and the relationship between them including any trends in the performance of centres • The capacity of existing centres to accommodate new town centre development <p>We consider these aspects of the PSMDLP to be particularly weak and confusing (see also Part 2 of these representations). Is North Acton even beginning to perform as a 'town centre'? Why should town centre uses choose in future to locate at Channel Gate? What assessments have been undertaken in relation to these proposals?</p>	<p>No change proposed. OPDC considers that the Local Plan is consistent with national policy set out in the 2012 NPPF and the NPPG.</p> <p>The Retail and Leisure Needs Study remains robust. The study's assessment for the quantity of retail and leisure floorspace is based on the local population's demands for retail and leisure (town centre) uses. The proposed amendments result in a marginally lower population (43,016 people from the submission Local Plan 44,043 people shown in the Social Infrastructure Needs Study Update) and therefore the floorspace requirements are consistent. What has changed is the location of portion of the Old Oak Major Town Centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>OPDC's Local Plan continues to provides guidance for the location of town centre land uses to establish the North Acton Neighbourhood Town Centre. Aside from accommodating the Use Class Order changes, Policies P7 and P7C1 relating to town centre uses remain as per the Submission Local Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect emerging trends in town centre uses including support Covid recovery measures.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	51		General	Consistency with national policy			<p>For the above eight reasons, we believe that the PSMDLP in its modified form falls well short of the required level of conformity with the NPPF and National Planning Practice Guidance.</p>	<p>No change proposed. OPDC considers that the Local Plan is consistent with national policy set out in the 2012 NPPF and the NPPG.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	52		General	Procedural			The final section of Part 1 of these representations addresses some legal questions over the extent to which OPDC's proposed modifications have in reality become a 'hybrid' process involving continued 'preparation' of a draft local plan undertaken part way through the examination. As we understand, sections 19 and 20 of the PCPA 2004 do not provide for such combined activity. In our view the PSMDLP has become an exercise of 'revision' of a Local Plan, whereas a return to Regulation 18 'preparation' stage is required. Hence our comments below.	No change proposed. OPDC considers that the proposed modifications are legally compliant. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	53		General	Extent of changes			LEGAL QUESTIONS OVER THE EXTENT OF MODIFICATIONS UNDERTAKEN DURING THE EXAMINATION STAGE As we understand the legal position, it is established in case law that There is no provision in the legislation which allows the LPA to replace all or part of the submitted plan with a revised plan during the examination (paragraph 1.5 of Inspectorate Procedure Guide). We appreciate that this Guide also states that Main Modifications can range in scope from redrafting parts of an individual policy or of the reasoned justification, to the deletion of whole policies or site allocations and the insertion of new ones. But there must be a point where a boundary is drawn between 'modification' and wholesale 'revision' of a Local Plan?	No change proposed. OPDC considers that the proposed modifications are legally compliant. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the modifications are focussed on spatial aspects of the Local Plan and modifications to site allocations and place-based policies. The cross-cutting policies dealing with matters like housing, transport, employment, environmental sustainability remain largely unchanged.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	54		General	Local Plan should not have been submitted			<p>Having reviewed in detail the history of the PDMDLP, we argue that OPDC should not have submitted the 19.2 version of the Draft Local Plan to the Secretary of State in October 2018. This draft did not meet the requirement at Section 20 (2)(b) of the PCPA 2004, that submission should not take place until such time as the LPA thinks that the document is ready for independent examination.</p> <p>As explained in the London Assembly Budget and Performance Committee in its January 2021 report¹⁵ In 2018, the OPDC submitted a bid for £250 million in public money from the Government's Housing Infrastructure Fund (HIF) without securing the support of the pivotal landholder on the development site, and was subsequently slow to clarify details around this miscalculation¹⁶.</p> <p>The October 2018 submission of the draft plan took place after OPDC were aware of Cargiant's opposition to the HIF bid¹⁷. OPDC subsequently chose not to disclose to the London Assembly (nor to the Inspector in 2019) the fact that the MHCLG conditions for the award of £250m of Housing Investment Funding made clear that this award was time limited and dependant on a series of agreements with landowners and/or strategies around compulsory purchase being in place.</p> <p>On February 27th 2020, the StQW Neighbourhood Forum wrote to members of the OPDC Audit and Risk Committee with a series of questions including these two below: Why was the content of the HIF Expression of Interest kept confidential from September 2017 to January 2020, and not released either to Cargiant or to those seeking this information under FoI/EIR? This was a bid for Government funds from a public body, to support a Mayoral regeneration programme. Much earlier public exposure of the assumptions in the bid would have identified potential flaws long before the Planning Inspector's intervention in September 2019.</p> <p>Similarly, why were the conditions attached to the bid not published as soon as these were communicated by MHCLG to OPDC in April 2019? And why not provided to Planning Inspector Paul Clark as very relevant to his examination of the Draft Local Plan? (emphasis added). What were the merits of confidentiality at that stage, extending even to London Assembly members?</p> <p>We consider that the 19.2 version of the Local Plan was never likely to meet the tests for soundness, whether or not Cargiant intervened in the 2019 EIP hearings in the way that it did. As noted by the London Assembly, much public money has been wasted as a result of lack of transparency by OPDC at critical moments between 2018 and 2021.</p> <p>¹⁵ The OPDC - Undelivered plans and the financial challenges of COVID-19 Budget and Performance Committee January 2021</p> <p>¹⁶ OPDC submitted the 19.2 DLP to the Secretary of State on October 4th 2018. As revealed in the London Assembly January 2021 report, In the B& P meeting on 14 October 2020, David Lunts, Interim Chief Executive Officer for the OPDC confirmed that "it was, frankly, an error for the OPDC at the time [of the HIF bid] to claim that Car Giant was still supportive when clearly it was no longer supportive."</p> <p>¹⁷ The Assembly B&P Committee report states On 21 September 2018, just 11 days after the HIF bid was submitted by the OPDC, Car Giant wrote to the OPDC to inform it that they were formally objecting to the OPDC HIF bid. This letter from Cargiant was provided to the committee, but does not appear to have been published by OPDC alongside other HIF documents at Being open and transparent London City Hall</p>	No change proposed. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. Thereby meeting the legal requirements. Cargiant's objections to the HIF bid, were, at that time on the basis of the assumed accelerated delivery of development from 2022 on Cargiant land in advance of them having found a satisfactory relocation site. Their objection to the HIF bid in September 2018 was not considered to undermine the effectiveness of the Local Plan, which at submission had the Cargiant sites being delivered in years 5-20, or years 2023-2038.	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	55	General	Extent of changes	<p>Structure of the PCPA and separation of the preparation and examination stages of a Local Plan</p> <p>We understand that the structure of the PCPA 2004 involves a clear separation between preparation and examination stage. The nature of this separation was explored in the case of Samuel Smith Old Brewery (Tadcaster) and Selby District Council¹⁸</p> <p>Paragraph 28 of this Appeal Court judgment states as follows (with our emphasis added): <i>The stages of the plan-making process constituting, respectively, the preparation of a local development document, as provided for in section 19, and independent examination, as provided for in section 20, are distinct and separate from each other. The language of section 19 is consistent in referring to the activity of "preparing" the plan. The language of section 20 is consistent in referring to the "examination" of a plan that has, by then, been prepared and submitted to the Secretary of State for this further exercise to be carried out as the next stage of the total process.</i></p> <p><i>Section 20(2) states that an authority can only submit a plan for examination when the authority has "complied" with any relevant requirements (that is to say, the authority has finished doing everything required of it regarding the preparation of the plan as set out in section 19 and, when it applies, in section 33A) and the authority thinks the document is ready for independent examination (i.e. the authority thinks its preparation is complete and at an end). A plan can only be submitted for public examination once it has been prepared, and not while its preparation is still going on.</i></p> <p><i>The concept of plan preparation by the local planning authority and independent examination by an inspector being in any sense concurrent and overlapping stages of the process is alien to the statutory scheme. They are sequential stages. Preparation comes to an end before examination begins. The former is an activity undertaken by the local planning authority, the latter an activity undertaken by the inspector, albeit with scope for him to call for further work to be done by the authority with a view to making the plan sound. As Ouseley J. observed in paragraph 29 of his judgment, once the plan passes from the stage of preparation to the stage of examination, it leaves the authority's hands – save for the authority's power of withdrawal under section 22 – until it is able within the constraints of section 23 to adopt it.</i></p> <p><i>And further at paragraph 42 It is true, as Mr Village submits, that a local planning authority will often undertake further work to refine or amend the provisions of the submitted plan once the examination stage of its plan-making process is under way, whether on its own initiative or prompted by the inspector to do so. And it may well be that such work, had it been done before the submission of the plan to the Secretary of State, would have qualified as activity in the preparation of the plan, within section 19. Sometimes that work will be done while the examination is running, on other occasions during a suspension or adjournment, as happened in this case.</i></p> <p><i>However, as Ouseley J. held, the carrying out of such work, in whatever circumstances it is done after the examination stage has begun, does not displace the autonomous role of the inspector in conducting the examination, nor does it take the process back to the stage of plan preparation, or create a hybrid phase in the process comprising plan preparation and independent examination in a single composite stage.</i></p> <p>While this particular legal case centred on the question of stages at which the Duty to Cooperate applies, we contend that in the case of the OPDC Local Plan the reality has been that a 'hybrid' stage has been taking place over the period between September 2019 and March 2021. We consider that the nature and extent of this 'hybrid' activity risks an outcome that would be unlawful – were the PSMDLP to proceed to adoption.</p> <p>Relevant considerations, we would suggest, are:</p> <ul style="list-style-type: none"> • The duration of the suspension of the examination (the last EIP hearing was in July 2019, and the modified draft plan submitted to the Inspector in March 2021, prior the further public consultation period currently being undertaken in mid 2021). • The fact that in their response to the Inspector in November 2019, OPDC officers advised that modifications would be ready by 'early 2020' (7th November 2019 letter from Tom Cardis). A further year of work was then undertaken, which must sensibly be described as 'preparatory' (OPDC itself used this term in commissioning work from Prior + Partners). • The nature and extent of this additional work of 'preparation' undertaken by OPDC officers during 2020 and early 2021. • The extent to which entirely new sections of the PSMDLP have been inserted and others amended in their substance, as compared with the 19.2 version submitted in 	<p>No change proposed. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The length of time taken to compile the evidence and main modifications is not exceptional - other local planning authorities have undergone similar processes as part of their examination.</p> <p>The Western Lands programme does not form part of the Local Plan's evidence. It is work being undertaken in OPDC's role as a delivery body, not as a local planning authority. Relevant Local Plan supporting studies have been updated and new studies have been produced to support the proposed modifications and respond to the Inspector's Interim Findings.</p>	N
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Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
											<p>October 2018.</p> <p>On the question of further 'preparation' post September 2019, there must surely be some limit to extent to which the overall spatial strategy of a Local Plan, its key transport routes, and the siting of its 'major town centres' can be varied at post-submission stage while remaining within the statutory framework of S19 and S20 of the 2004 Act?</p> <p>The Inspector's September 2019 interim report (ID 33) concluded at paragraph 59 My interim finding is therefore that site allocations 2 and 3 should be deleted from the plan (subject to adjustments consequent on the progression of phase 1a of Old Oak North) and that consequent adjustments to the numbers of homes and jobs likely to be delivered during the plan period should be made but that no adjustment be made to the proposal to de-designate SIL land or to the figures which recognise the capacity of the plan area beyond the plan period.</p> <p>It was OPDC's choice (announced in November 2019 but not reported to the Board until January 30th 2020) to embark on a whole new 'Western Lands' strategy. This strategy has involved identification of a series of further housing sites, redefining various locations as 'parts of a major Old Oak town centre', and fundamental changes to the transport network to the area.</p> <p>The total of OPDC expenditure on its 'Western Lands' strategy has proved hard to track but a report to the October 13th 2020 OPDC Board included the following recommendation (which was agreed) 2.4. Approve expenditure of £257,000 in this financial year for preliminary technical work required to prepare a Single Housing Infrastructure Fund (SHIF) bid and business case. Together with two previous approvals, this will commit the remainder of OPDC's £440,000 budget for Western Lands preparatory work in 2020/21. Note that this expenditure is for externally commissioned consultancy input, and that OPDC refers to this as 'preparatory work'.</p> <p>While OPDC officers (and to a questionable extent Board and Planning Committee members) have in the last 16 months become familiar with this 'change of direction' the proposals set out in the PSMDLP in 2021 now bear little relation to the vision of a 'new Old Oak' as defined in the 2015 OAPF and in the Regulation 18 and 19 OPDC Draft Plans.</p> <p>Several of the 'Place' sections in Chapter 4 of the PSMDLP are new or have been substantially redrafted. If this and the associated consultancy and inhouse work is not 'preparation' activity on a Local Plan, we question what would fall into this category?</p> <p>18 Court of Appeal case Neutral Citation Number: [2015] EWCA C= iv 1107 Case No: C1/2014/40991107</p>			

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	56	General	Consultation	<p>We also question the basic fairness of the current consultation exercise on the PSMDLP. OPDC maintains in its leaflet delivered to 44,000 addresses in the area that While the majority of the Draft Local Plan remains the same, our proposed updates identify some new sites for housing development and protect others for employment intensification.</p> <p>We do not see how this can be accepted as an accurate statement to the public on a Draft Local Plan which includes major proposals never previously published, along with the removal of proposals which were key to the effectiveness of the 2018 Draft version.</p>	<p>No change proposed. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. These reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>	N
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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	57		General	General			For all the above reasons we argue that the PSMDLP documentation has failed the tests of being positively prepared, justified, effective and in accordance with national and London Plan policy.	No change proposed. OPDC considers that the Local Plan meets the tests of soundness, is consistent with national policy and is in general conformity with the 2021 London Plan. The Mayor has confirmed the proposed modifications are in general conformity with the 2021 London Plan.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	58		General	Extent of changes			Modification and adoption of the 19.2 version dating from September 2018 we do not see as a viable or lawful way forward, or one that will lead to successful and sustainable development of this key regeneration area in the 2018-28 period.	No change proposed. OPDC considers that the Local Plan supporting studies demonstrate the proposals are deliverable and that the Local Plan meets the legal and procedural requirements.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	59		General	Delay or withdraw the plan			The timetable for the opening of the OOC rail interchange in 2029/33 gives time for a full rewrite of the OPDC Local Plan, at a time when a new version can reflect changes in national policy, an updated NPPF, the 2021 London Plan, the National Model Design Code, the results of the 2021 Census and the long-term impacts of the pandemic on London.	No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area. The proposed modifications are considered to be in general conformity with the 2021 London Plan. Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to embed requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	60		General	Procedural			We see little merit in a decision that the PSMDLP should proceed to adoption with an immediate start of a new Local Plan. We see several aspects of the process, from the time of submission in October 2018 to the present, which would be open to legal challenge had we the funds to make such an application.	No change proposed. OPDC considers that the development of and the content of the Local Plan meets the legal and procedural requirements. Local Plans are required to be reviewed within 5-years of adoption.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	61		General	General			PART 2 OF REPRESENTATIONS FROM THE OLD OAK NEIGHBOURHOOD FORUM AND ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM. Background This is second part of a joint set of representations from these two neighbourhood forums. These bodies were designated respectively by OPDC in 2018 and RB Kensington and Chelsea in 2013, The StQW Neighbourhood Forum has a membership of 370 residents and businesses in the north-west corner of North Kensington, bordering on the OPDC boundary. The Old Oak Neighbourhood Forum (OONF) has a membership of 65 residents living or working within the designated area in East Acton and a further 65 'affiliated' members from the wider area. Both bodies have been responding to consultations on the OPDC Draft Local Plan since 2016. Part 1 of these representations was sent to OPDC and to Planning Inspector Paul Clark on June 6th, He responded via the Programme Officer Charlotte Glancy on June 9th. An earlier version of this 'Part 2' document was sent to OPDC on 27th March as a draft 'work in progress'. We asked OPDC officers to comment on any factual inaccuracies or misconceptions on our part. The OPDC response was to correct one inaccuracy in their consultation material on the number of versions of the Draft Local Plan published to date. Apart from this OPDC said that our comments were of a kind expected in the PSMDLP consultation exercise and would be addressed following the close of the consultation on July 5th 2021.	Noted.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	62		General	Consultation			<p>The PSMDLP documentation is complex for the public to deal with, involving a Table of Modifications, a tracked version of the Draft Local Plan, and a set of amended 'Figures' (maps and diagrams). There are also new and amended supporting documents, several of which include very important content.</p> <p>Where referring to currently proposed modifications, we have applied the same colour scheme for references to modifications as in the OPDC Table of Modifications: Submission Modifications reviewed by the Inspector Other modifications reviewed by the Inspector Post submission modifications that have not been reviewed by the Planning Inspector Modifications superseded by post submission modification. These have not been reviewed by the Planning Inspector</p> <p>There are many other comments in these representation which are not colour coded, where we are suggesting that further modification are needed for the PSMDLP to even begin to read as a coherent and internally consistent document. Passages of text left unmodified remain in the Draft Local Plan, referring to a different location than when drafted for the Regulation 19.2 version. There are statements which no longer make sense, unmodified, because the context in which they now appear is different from the 19.2 version.</p> <p>In terms of OPDC paragraph numbering cited in these representations, we have worked primarily from the full tracked version of the PSMDLP, rather than from the OPDC 'Table of Modifications'. There are some inconsistencies of paragraph numbering between these documents. We have found that reading the full tracked version is the only way to review the document in its totality, and to identify where further editing is needed to render the Draft Plan internally consistent and comprehensible.</p>	Noted.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	63		General	Delay or withdraw the plan			<p>As argued in Part 1 of our representations, we continue to believe that given the number and extent of changes made to the 19.2 text and 'Figures', a full redraft and return to Regulation 18 stage is the only way forward that will allow for sufficient public consultation and for a 'sound' Local Plan to emerge.</p>	No change proposed. OPDC considers that the proposed modifications are sound. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	64	General	Consultation	<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below:</p> <ul style="list-style-type: none"> • We consider the consultation material, including online sessions and the sub-site set up by OPDC to be inadequate for reasons explained below. The magnitude of the changed spatial and transport elements of the Draft Plan was seriously understated by OPDC. 	<p>No change proposed.</p> <p>The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. 	N
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												<ul style="list-style-type: none"> An open offer for officers to attend community events and hold one-to-one meetings with community members. A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	65		General	Extent of changes			<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: Anyone reading the Table of Modifications alone might well not even notice the fundamental changes relating to Old Oak North, Scrubs Lane, Channel Gate and transport infrastructure.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	66		Spatial Vision				<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: Unmodified parts of the Plan continue to make exaggerated and unevidenced claims for the 'connectivity' of 'Places' at Old Oak and the impact that the OOC rail interchange will have on the wider area of West London.</p> <ul style="list-style-type: none"> This impact will emerge only after 2030 by which time this PSMDLP will need to have been reviewed once if not twice. 	<p>No change proposed. OPDC considers the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	67		Strategic Policies		SP10		<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: Levels of uncertainty on funding for infrastructure remain very high. For the next 10 years until OOC station is in operation, OPDC and Mayoral ambitions for the area should be scaled back – particularly at a time of major change resulting from the pandemic.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver an effective and deliverable Local Plan. OPDC's new and updated supporting studies including the Infrastructure Delivery Plan and Strategic Site Allocations Viability Assessment demonstrate the plan's deliverability. The infrastructure requirements to support the modified sites result in a smaller infrastructure funding gap and consequently, more certainty that sites will be brought forward for development.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p>	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	68		Spatial Vision				<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: With a high probability of no new Overground stations and no new east-west road connection between East Acton and North Hammersmith, the whole coherence of the 19.2 version of the Draft Local Plan is undermined.</p>	<p>No change proposed. OPDC considers that the proposed modifications to the Local Plan deliver a sound and appropriate spatial strategy for the OPDC area that is fully justified through a new and updated supporting studies. It is common for Local Plans to cover areas of different character and include proposals for different land uses within different parts of the plan area. this in itself does not make a plan unsound.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p> <p>Proposed modifications to Policy P2 regarding Old Oak North also support the delivery of ancillary services and facilities to support place-making and activate key routes to support connectivity.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	69		Strategic Site Allocations Viability Assessment				<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: We are not persuaded by the content of the BNP Paribas Strategic Site Allocations Viability Study (see Annex C).</p>	<p>Noted. Please see responses to detailed comments from OONF/ StQW.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	70		General	Extent of changes			<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: Entirely new proposals for concentrations of very high density and high rise housing are introduced as modifications to a Local Plan already 3 years into its examination stage.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. The policies proposed to be modified will be implemented alongside the series of cross cutting policies to deliver sustainable high quality development that appropriately responds to the existing context. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	71		Strategic Policies		SP6		<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: Proposals for a 'major Old Oak town centre' are unclear and incoherent.</p>	<p>No change proposed. The proposed modifications relating to the updated location of portions of the Old Oak Major Town Centre are considered to be justified and effective.</p> <p>Policy SP6 defines the proposed town centre hierarchy. The Local Plan and proposed modifications are clear in the distinction between the Old Oak Major Town Centre and North Acton Neighbourhood Town Centre. Further guidance is provided for portions of the major town centre within the Places Chapter.</p> <p>The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The proposed Old Oak Major Town Centre is depicted in figures 2.2, 3.7 and 10.3.</p> <p>Proposed town centre boundaries have been removed from the Policies Map in response to the Inspector's Question 2. Discussions on this matter was carried out at Hearing Session 14.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	72		Places		P9 and P10		<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: Lack of adequate new public transport improvements means that proposals at Channel Gate and Scrubs Lane will not conform with 2021 London Plan policy.</p>	<p>No change proposed.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections.</p> <p>These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p> <p>The GLA has confirmed that the proposed modifications are in general conformity with the Mayor's London Plan and confirm their support for the proposed modifications on Scrubs Lane. See comment 82/11</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	73		General	Extent of changes			<p>This Part 2 of our representations is of necessity a long and detailed document. The main points which we wish to draw to the attention of the Planning Inspector are summarised below: There is no evidence that the Duty of Co-operation with neighbouring Boroughs has continued to be met since September 2018, and some evidence to the contrary.</p>	<p>Noted. OPDC considers it has met the Duty to Cooperate requirement and works closely with its public sector stakeholders including the three host Boroughs.</p> <p>The Duty to Cooperate is required to be carried out during the preparation of the Local Plan. The preparation period completes at the point of submission. OPDC submitted its Local Plan in October 2018. Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, as requested by OPDC's planning inspector.</p>	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	74	General	Consultation	<p>THE OPDC CONSULTATION PROCESS AS UNDERTAKEN BETWEEN 17 MAY AND 5TH JULY 2021</p> <p>This consultation was made known to the public by several means:</p> <ul style="list-style-type: none"> • A two page 'dear owner/occupier' letter which we understand was delivered to 44,000 households within the OPDC boundary and in the wider area. • A dedicated consultation sub-site area, which could be reached via a link from the main OPDC website (we asked and OPDC agreed to add this link to the OPDC 'landing page'). There remain many local residents who have never heard of the OPDC, who do not realise that it has since 2015 been the planning authority for the area, and who have never thought of finding and logging onto its website. • A coloured leaflet with more maps, diagrams and details of the modifications including a set of FAQs. This leaflet appeared on the consultation sub-site. We do not know how it was otherwise distributed. • A series of five consultation sessions held on Zoom between 26th May and 19th June, for which the public could register to attend via Eventbrite. Numbers of members of the public joining these sessions we think were in the 30-50 range many of whom have already been active in tracking the OPDC Draft Local Plan for the past five years. We consider that all these initiatives suffered from the same fatal flaw – that of failing to make clear to the average member of the public living or working in the area the full extent and scope of the changes made between the 2018 Submission Version of the Draft Local Plan and the PSMDLP documentation sent to the Planning Inspector on March 5th 2021. <p>The letter to 44,000 households (reproduced at Annex B of these representations) included this paragraph <i>The proposed changes, known in planning terms as Main Modifications, refer to the location of planned housing and development. Although much of our Draft Local Plan hasn't changed, we are no longer bringing forward housing in Old Oak North but protecting it as a place for employment. We have identified sites, nearer to the new HS2 Old Oak Common Station, for new and affordable homes, jobs, public spaces and facilities. Our targets for sustainable travel, high quality design, environmental sustainability and affordable housing are the same.</i> The coloured leaflet, with its further information gave 'the story so far' as <i>While the majority of the draft Local Plan will stay the same, our proposed updates identify some new sites for housing development and protect others for employment intensification</i> (our emphasis in both case above).</p> <p>Once the nature and extent of the changes between the 2018 and 2021 versions are explained, local residents say 'that's nothing like what we thought was going to happen'. For good reason. While it may be true on a simple wordcount that 'the majority of the draft Local Plan remains the same' this is not how it appears to those familiar with the area.</p> <p>Importantly, the major spatial and transport changes as between 2018 and 2021 have been seriously underplayed by OPDC in the consultation material – we believe in an effort to present these to the Inspector as 'modifications' rather than fundamental 'revisions' to a Draft Local Plan.</p> <p>It must be remembered that this is a case where wholly new concentrations of housing and 'town centre uses' are being proposed for a part of London much of which has never been developed beyond railway and industrial use. OPDC has created new labels for areas and 'Places' (such as 'Old Oak North') which are not in common use amongst those who live or work in the area. OPDC planning officers have become familiar with such labels. West Londoners have not.</p>	<p>No change proposed.</p> <p>The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. This material provided a summary of the proposed changes and pointed people to where further information could be found. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. 	N
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												<ul style="list-style-type: none"> • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	75	General	Consultation	<p>We think that a more honest paragraph to have included in the letter sent to 44,000 households would have read as follows.</p> <p>Our 2018 proposals were based on a major new town centre and 6,500 new homes on the Cargiant Land at Hythe Road. This was planned to have its own new Overground station to improve public transport access, and to connect to the new HS2 and Elizabeth Line station to the south. A new 'high street' of major shops and commercial buildings was to have joined up these locations. These plans were dropped in late 2019.</p> <p>Instead we are now proposing new concentrations of high density/high rise housing on Victoria Road and Old Oak Lane in East Acton. We hope that these locations will then attract new retail and commercial activity. We will be continuing to give consent to further high density/high rise housing developments in Scrubs Lane, but public transport access will no longer be improved there other than via extra buses. Regrettably there will be no vehicle access to the eastern end of the new Old Oak Common station for buses, cars and taxis. The station entrance and exit will be in Old Oak Common Lane.</p> <p>This new rail interchange is now expected to open sometime between 2029 and 2033 and not in 2026 as we told you in our 2018 Draft Local Plan (OOS 1). For a variety of reasons, there will not be much new development immediately around the station, or above it as once planned. We hope that Transport for London may be able to find funds in a few years time to build a new Overground station at Old Oak Common Lane, but TfL have major pandemic related budget shortfalls. North Acton will continue to see further additions to the cluster of tall buildings (including those at 50-60 storeys) to which Ealing Council has granted approval on OPDC's behalf since 2015. HS2 construction works and vehicle movements will continue to create planning blight, major traffic and air pollution problems in East Acton and surrounding areas during the next decade. We suggest that you treat marketing material for new homes in the area with care and caution, especially in relation to any claims that the new HS2 station is 'coming soon' 1.</p> <p>1 Marketing material for 'Oaklands Rise' from Notting Hill Genesis/QPR makes this claim, which OONF has asked to be corrected as contravening ASA/Committee of Advertising Practice rules. Still published at https://www.nhgsales.com/sales-developments/oaklands-rise/ as of 05.07.21.</p>	<p>No change proposed.</p> <p>The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be 	N
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												available in Braille or audio format. <ul style="list-style-type: none"> An open offer for officers to attend community events and hold one-to-one meetings with community members. A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	76			General			Over a period of years, the local perception is that the OPDC has failed to come to terms with the consequences of its late 2019 'change of direction' and has chosen to continue with unevidenced assertions and unrealistic aspirations in its Draft Local Plan. The gap between these claims and future reality for Old Oak as perceived by local people, has widened rather than narrowed as the Plan has been 'modified'. Hence our firm belief that a fresh start on the Old Oak part of the Local Plan is needed in 2021.	No change proposed. OPDC considers that the proposed modifications are justified, effective, have been positively prepared and are consistent with national policy requirements. They are supported by new and updated robust supporting studies to deliver a Local Plan that we consider to be sound. We consider that our proposed modifications are sound. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	77	MINOR/2/G28, MINOR/2/SV6 and MM/PS2/OPDC/SV6	Transport			T5	We do not consider it reasonable for OPDC to refer to Old Oak Common Lane Overground Station as a 'potential' station in this iteration of a Local Plan. TfL consulted on this and the previously proposed Hythe Road station in October/November 2017. Many local people recall this exercise. Since 2017 the prospects for implementation of this project within 5-10 years has diminished markedly. The station is not in TfL's future capital programme and TfL have a major budget crisis to address. Hence the description 'Possible future station' would be more accurate and would discourage developers and the property press from raising false expectations of the connectivity of this part of the OPDC area.	No change proposed. OPDC and TfL strongly support the delivery of Old Oak Common Lane Overground station and the station has a strong business case for investment. However, the station has been identified as a 'potential' station in the Local Plan as its purpose is to support wider London connectivity rather than to support local homes and jobs. As such, the cost of bringing forward the station is the responsibility of TfL rather than OPDC. This has been agreed with TfL in our Statement of Common Ground and TfL is engaged in discussions with national government, HS2, Network Rail and others in relation to funding the station.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	78		Foreword / Introduction				If a version of the 'Chairman's Foreword' is to remain in the final document, we question the claim that Old Oak 'will become one of London's most accessible destinations.' This claim is made repeatedly through the document, along with assertions on the 'high connectivity' of the area. We do not see that the claim can be substantiated. Following the November 2019 'change of direction' and the abandonment of previously planned key routes and Overground stations, the claims for Old Oak as an area with unusually high connectivity are seen locally as being untrue. Areas of proposed concentrated housing at Scrubs Lane and Channel Gate will continue to have comparatively poor public transport access by inner London standards.	No change proposed. The Old Oak Common station remains one of the most connected transport hubs in the UK, connecting HS2, Crossrail and the Great West Main Line. Public transport accessibility levels in Old Oak will be greatly increased with the arrival of Old Oak Common station and the other transport investments set out in the Local Plan, as shown in figures 7.10 and 7.11.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	79	MM16/PS/Q26 1.19	Foreword / Introduction				This additional material on Borough Local plans is welcome. It should also state the 'plan period' for the PSMDLP. This timespan is not made clear on the cover of the document or in the introductory text.	Change proposed. OPDC's Local Plan period is stated in paragraph 3.20 supporting Policy SP4. To further clarify the plan period, officers propose the plan period is stated on the front cover and referenced in the Local Plan's Introduction Chapter.	Y	117/79
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	80		Foreword / Introduction			1.23 and 1.24	1.23 and 1.24 These assert that the entirety of chapters 4 and 11 are 'strategic policies'. No justification for this assertion is offered. See the comment below on the same issue at newly inserted paragraph 11.37 of the PSMDLP. As noted in Part 1 of these representations, this approach is not compliant with the 2012 NPPF paragraphs 156, 184 and 185.	No change proposed. OPDC's definition of strategic policies is considered to be consistent with national policy. The proposed modifications did not amend OPDC's definition of strategic policies.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	81		Foreword / Introduction			1.27	This is now out of date. A series of HS2 Section 17 applications on the OOC station its immediate surroundings, and works to Victoria Road and Wormwood Scrubs have already been consented by OPDC. Construction of OOC station is well underway.	No change proposed. The paragraph is still accurate as there are still further Schedule 17 applications to be submitted by HS2 for the station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	82		Spatial Vision				<p>Spatial Vision – this repeats the <i>'highly connected'</i> claim. The much reduced transport context for the area (in terms of road and public transport networks) is one of the biggest set of changes since 2018. This needs to be recognised throughout the text of the PSMDLP.</p> <p>At present, it is only those who read the documentation as far as the modified map of Key Routes in the Table of Figure Modifications at Figure/PS2/OPDC/PM2 who will understand the full extent of these changes. Consultation materials and presentations to OPDC Board and Planning Committee have continued to rely on diagrams of an aspirational long term <i>'movement network'</i> of which key elements will not be in place within the plan period, if ever. The modified Policies map Figure/PS2/OPDC/PM1, to which the discipline of an examination has been applied, shows the extent to which firm infrastructure proposals have become more limited than those assumed in 2018.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The Old Oak Common station remains one of the most connected transport hubs in the UK, connecting HS2, Crossrail and the Great West Main Line.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p> <p>Public transport accessibility levels in Old Oak will be greatly increased with the arrival of Old Oak Common station and the other transport investments set out in the Local Plan, as shown in figures 7.10 and 7.11.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	83	MM/PS2/OPDC/SV/3	Spatial Vision				Thinking Big (2) The words 'Old Oak' have been deleted and replaced by the text <i>The OPDC area will become a major new London centre providing high-density mixed use development, that will shape west London and support London's continued growth.</i> It cannot sensibly be argued that the whole 'OPDC area' will 'become a major new London centre'. This is one of many simplistic modifications to text which make parts of the PSMDLP document near incomprehensible.	No change proposed. OPDC considers the proposed modification is sound reflecting the OPDC area's role, opportunity and significance within London.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	84		Spatial Vision				The whole of the Thinking Big and Going Local section is made up of generalised statements and optimistic assumptions. This section does not add clarity or specifics to the Draft Local Plan and would not be missed if deleted.	No change proposed. OPDC continues to consider the Thinking Big and Going Local section is sound and relevant and reflects the role that a spatial vision is supposed to fulfil. The majority of the section remains unmodified.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	85		Spatial Vision			Figure 2.1	The table of text in Figure 2.1 lists a series of 'opportunities and challenges'. Several sections of this text need rewording, if they are fairly and accurately to reflect other modifications in the PSDLP documentation, including the revised 2021 Infrastructure Delivery Plan (IDP). These sections are as follows:	No change proposed. Where required, OPDC has proposed modifications to figure 2.1 to respond to the Inspector's requests including the Interim Findings.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	86	MM/PS2/OPDC/SV/5	Spatial Vision			Figure 2.1	Economic Growth: not clear if this is a main or minor modification.	No change proposed. There are two modifications within this section. Each has it's own label and identifies one as a minor modification and one as a main modification.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	87		Spatial Vision			Figure 2.1	<p>Figure 2.1 Wording on Higher Density Development remains unchanged and reads <i>The area's public transport access will provide significant opportunities to create high density development, which will have benefits in terms of optimising the delivery of homes and jobs.</i> Comparison of the PTAL maps from the 19.2. version and the PSMDLP (at Figure/PS2/OPDC/7.11) shows that predicted improvements in PTAL levels are now much less widely spread across the OPDC area than at 19.2 stage. For the eastern part of the area, this reduction reflects the loss of the proposed Hythe Road Overground station. It is not clear whether the PSMDLP PTAL map assumes delivery of the 'potential' Old Oak Common Lane Overground? Hence the area's public transport access is very different from that when Figure 2.1 was originally drafted. The actual evidence no longer supports the proposed policy.</p>	<p>No change proposed. OPDC considers the proposed modifications are sound. The Old Oak Common station remains one of the most connected transport hubs in the UK, connecting HS2, Crossrail and the Great West Main Line.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p> <p>Public transport accessibility levels in Old Oak will be greatly increased with the arrival of Old Oak Common station and the other transport investments set out in the Local Plan, as shown in figures 7.10 and 7.11.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	88	MM/PS2/OPDC/SV/6	Spatial Vision			Figure 2.1	<p>MM/PS2/OPDC/SV/6 Figure 2.1 'Transit oriented development' – our understanding of this term is that it is an urban planning concept originating in the USA and similar to the idea of 'compact cities'. We do not see the two new concentrations of housing now proposed in the PSMDLP (Scrubs Lane and Channel Gate) as qualifying for the use of this term. These areas are far more distant from any form of mass transit station than locations to which this term is normally applied.² London Plan D2a requires that development should depend on future planned levels of PTAL, but the PSMDLP includes few firm plans for new transport infrastructure. Overbuilding at OOC station would have been a different story.</p> <p>² Typically in TOD, higher density development is allowed or required within a short distance of the transit station (300-500ft). Further away from the station – 500-1500ft – is usually located another, less intensive zone, with a continued mixture of uses. Finally, a zone from 1500 feet to the edge of the TOD zone is still less intense in density and uses are intended to blend into the surrounding community https://planningtank.com/urbanisation/transit-oriented-development</p>	<p>No change proposed. The PTAL mapping in the Local Plan shows that much of the OPDC area will be well served by public transport and in accordance with the 2021 London Plan, it is therefore appropriate to minimise car parking and prioritise travel by public transport. The Local Plan requires car free development in areas of high transport accessibility (PTAL 4-6b) in order to support transit oriented development, as set out in Policy T4 and paragraph 7.9.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	89	MM/PS2/OPDC/P1C1/1	Spatial Vision			Figure 2.1	<p>Figure 2.1 Deliverability – The unamended text (last sentence) reads <i>there are challenging sites such as the Elizabeth Line Depot, which will either require relocation or decking to enable development to be brought forward</i>. As we understand, there is now no realistic prospect of land occupied by this Depot or by the IEP Depot becoming available in the 20 year life of the PSMDLP. 'Decking' over the OOC station was ruled out in 20163.</p> <p>We understand that the Department of Transport currently retains safeguarding rights (neither time limited nor conditional on further studies) over part of the 'Adjacent Site' south of the OOC station (passive provision for two reinstated tracks of the 1906 Great Western 'High Wycombe Railway Line'). This context (and constraint) was confirmed by OPDC officers at the February 23rd Planning Committee. It should be made explicit in the supporting text to Policy P1C1: Old Oak Common Station Cluster MM/PS2/OPDC/P1C1/1.</p> <p>3 https://www.standard.co.uk/news/london/old-oak-common-regeneration-scheme-risks-being-london-s-worst-cockup-in-50-years-a3194581.html</p>	<p>No change proposed. The Elizabeth Line Depot is not identified for development within the Local Plan period. This is evidenced in the Development Capacity Study.</p> <p>No change proposed. The development capacity for the Old Oak Common Adjacent Station Development site reflects the safeguarding for potential additional rail services to Old Oak Common Station.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	90		Strategic Policies		SP1		<p>Sub-sections b) and c) of this policy are mere aspirations and not spatial planning policies. As aspirations, they are again hyperbole in the context of this modified Plan and are not evidenced by anything within the remainder of the PSMDLP.</p> <p>Sub-paragraph b) reads <i>support the delivery of a new part of London, which is both a destination and a gateway to London and the rest of the UK</i>;</p> <p>In what sense will OOC station become 'a gateway' to the rest of the UK as compared with e.g. St Pancras/Euston/Kings Cross? 'A London gateway from the Midlands' would be accurate. The claim that London is <i>the world's economic and cultural capital</i> is not credible. (sub-paragraph c(ii)).</p>	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. OPDC considers the policies continue to be sound.</p> <p>The delivery of Old Oak Common Station was not subject to the proposed modifications to OPDC's Local Plan and will continue to be a world-class transport super-hub, supporting the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	91		Strategic Policies		SP1	Paragraph 3.4	<p>Paragraph 3.4 covers the benefits of regeneration for the wider west London area. On paragraph 3.4 c. it is now widely accepted that there is no prospect of a new Crossrail station at Kensal in RBKC. No feasibility work is currently underway.</p> <p>MM/PS2/OPDC/SP4</p>	<p>Change proposed. OPDC acknowledges that feasibility work is not currently underway.</p> <p>However, RBKC's Local Plan continues to safeguard for the potential delivery of a new Elizabeth line station at Kensal Canalside.</p>	Y	117/91

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	92	MM/PS2/OPDC/SP4	Strategic Policies		SP1	Paragraph 3.4	<p>On the proposed long-term 'Wormwood Scrubs Street' all diagrams or maps need to make clear that western section of what would be a key new east west route is a distant prospect beyond the 20 year life of this Local Plan.</p> <p>Project TV4 in the Infrastructure Delivery Plan (eastern section of 'Wormwood Scrubs Street') shown with a cost of £2m is a plausible measure within 10 years. Project TV10 <i>Delivery of new Wormwood Scrubs Street West off Scrubs Lane, including new junction at Old Oak Common Lane</i> at £9.88m is shown as 'Desirable', 'Not committed' and in 'Phase 21+ years'.</p> <p>We think it unhelpful and misleading to include this western section of a planned 'Wormwood Scrubs Street' in the PSMDLP and ask that it be removed. This route has appeared in diagrammatic form in many images used for OPDC consultations. It provides an impression of a Local Plan which joins up the lands to the east and west of Wormwood Scrubs, and this may be why OPDC continue to show the route. But it has caused much confusion and raised false rumours (some positive and others negative) amongst local residents and users of the Scrubs.</p>	No change proposed. All Local Plan and Policy Maps figures set out in the Table of Figure Modifications show the western portion of Wormwood Scrubs Street to be delivered after the plan period. This is referenced in figure keys and Local Plan wording including paragraphs 3.56 and 4.15.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	93		Strategic Policies		SP1	Paragraph 3.4 f.	<p>Why will centres in an extended wider area including Ealing, Southall, Acton, Wembley, Hammersmith and Kensington, be influenced by the scale of development proposed at Old Oak and Park Royal? New development across the OPDC area, as proposed in the PSDLP, is spread across a large area and planned to emerge over a very long period. The most concentrated areas of proposed regeneration in the PSMDLP (at Channel Gate/Atlas Road, Scrubs Lane, and North Acton) are no more significant than the 3,500 -5,000 new Homes proposed for Kensal Canalside – a location for which no such grandiose claims are made by RBKC as the planning authority4.</p> <p>4 RBKC published in April 2021 for consultation a Draft SPD on the Kensal Canalside Opportunity Area</p>	<p>No change proposed. This is not an aspect of the Local Plan that has been modified. Notwithstanding, the delivery of the Old Oak Common station will continue to create one of the most connected transport hubs in the UK, connecting HS2, Crossrail and the Great West Main Line.</p> <p>The proposed modifications demonstrate the delivery of 26,000 homes and 56,250 jobs over the lifetime of the development and 19,850 homes and 36,350 jobs within the plan period alongside potential catalyst uses.</p> <p>This improvement in connectivity and significant quantity of development will benefit the west London sub region. OPDC is working closely with local boroughs and the West London Alliance to ensure economic and social benefits are secured for local communities.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	94		Strategic Policies		SP2		<p>Policy SP2 Good Growth – in the policy box sub-paragraph f) reads <i>Proposals should .. design, construct and manage a smart and resilient city</i>, 'Part of the city' should be substituted. This Local Plan is not going to create 'a new city' at Old Oak.</p>	No change proposed. The proposed modifications did not amend this part of the Local Plan.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	95	MM/PS2/OPDC/SP/14	Strategic Policies		SP6		<p>MM/PS2/OPDC/SP/14 Policy SP6 Places and Destinations – sub-paragraph b) of this policy box in continues to state <i>deliver and support a new town centre hierarchy, that offers a range of town centre uses, serving the needs of the development and that complements surrounding town centres. Proposals should support the delivery of the following hierarchy:</i> MM/PS2/OPDC/SP/14 6a. The modified policy now continues <i>Old Oak – a major town centre that delivers a wide range of town centre and community uses. The policy requirements for this centre can be found in policies P1, P2, P3, P7, P8 and P9 and P11;</i></p> <p>The wording then becomes confusing. Where is this new town centre to be? Where are its boundaries? November 2020 OPDC consultation material referred to Channel Gate/Atlas Road alone as the location for a <i>'major new town centre'</i> in the <i>'Western Lands'</i>.</p> <p>At its February 23rd 2021 meeting, the OPDC Planning Committee discussed the concept of a <i>'crescent shaped' Old Oak Major Town Centre</i>, encompassing North Acton, Acton Wells, the OOC station site and Channel Gate. Yet North Acton is separately defined in the PSMDLP at SP6 b) b as a <i>neighbourhood town centre, focussed around North Acton station, Victoria Road and along Portal Way</i>. So is North Acton to be part of <i>'Old Oak major town centre'</i> or is it not? Much of this location is already built out and shows no sign of attracting major town centre uses.</p> <p>This discussion at OPDC Planning Committee on February 23rd was the one and only occasion at which the OPDC Planning Committee considered the modifications to be submitted to the Planning Inspector. The discussion was a good one with some serious questions raised about (for example) the location of a <i>'major Old Oak town centre'</i>. But this led to no changes in the PSMDLP documentation as referred onwards to the Board on March 4th and to the Inspector on March 5th 2021.</p> <p>Maps and diagrams in the PSMDLP show a large area around at to the north of OOC station as a <i>'major town centre'</i> blurring into Channel Gate/Atlas Road. Scope for development on the section of Old Oak Common Lane running between the OOC <i>'western approach'</i> to the station and the centre of the Atlas Road/Channel Gate site is very limited, with little or no opportunity for activation on either side of the road (see later section on this <i>'Place'</i>). The distance separating the two locations involved in 1km (see aerial image below). Old Oak Park's <i>'High Street'</i> at Old Oak North was a very different proposition.</p>	<p>No change proposed.</p> <p>Policy SP6 defines the proposed town centre hierarchy. The Local Plan and proposed modifications are clear in the distinction between the Old Oak Major Town Centre and North Acton Neighbourhood Town Centre. Further guidance is provided for portions of the major town centre within the Places Chapter.</p> <p>The large area to the north of Old Oak Common station reflects the longer term intention to deliver a commercial centre focused on the QE Line depot site, and provides context to the locations identified for the Old Oak Major Town Centre within the plan period. Part of this area adjacent to Old Oak Common Lane is expected to be delivered within the Local Plan Period (See figure 3.16: Development Phasing).</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	96	MM/PS2/OPDC/SP/13	Strategic Policies		SP6		<p>MM/PS2/OPDC/SP/13 refers to a cultural centre. This dates for a time when OPDC commissioned a study to attract a suitable cultural offering at <i>'Old Oak Park'</i>. There is no evidence in recent years of any such interest and if and when it arises such a proposal can be considered on its planning merits.</p>	<p>No change proposed.</p> <p>The proposal for a cultural quarter is an important part of overall spatial vision for the area. MM/PS2/OPDC/SP/13 seeks to clarify that such uses are no longer only considered appropriate within what is considered Old Oak, given the change in approach at Old Oak North and Channel Gate.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	97	MM/PS2/OPDC/SP/16	Strategic Policies		SP6	Paragraph 3.34	MM/PS2/OPDC/SP/16 Paragraph 3.34 reads <i>To support this, chapter 4 (Places) identifies 12 places, with associated policies. Within these places, the Local Plan also identifies a series of 'clusters', which are characterised as locations that are likely to attract higher footfall and/or have a particular use and as such, warrant more detailed policy. This use of the term 'cluster' does not feature in the national Planning Portal glossary. Its use in this way by OPDC has already confused a public more familiar with 'clusters' of tall buildings. OPDC Planning Committee members on February 23rd requested use of an alternative term. Are these locations to be 'neighbourhoods' or in some cases only 'parts of neighbourhoods'?</i>	No change proposed. The proposed modifications did not amend Paragraph 3.34. This is a term that has been used continuously through the various stages of the development of the Local Plan. Clusters are characterised as locations that are likely to attract higher footfall and/or have a particular use and as such, warrant more detailed policy.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	98	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/20	Strategic Policies		SP6	Paragraphs 3.40 and 3.41	MM/PS2/OPDC/SP/19 Paragraph 3.40 further exemplifies the basic 'major town centre' flaw in the latest Plan. It now reads <i>A key facet to place-making in the OPDC area will be the location, role and function of its town centres. The town centre hierarchy consists of three centres (see figure 3.7) serving the needs of its existing and future residents, workers and visitors. The hierarchy consists of a new major town centre in Old Oak (but where?) and two neighbourhood town centres: one new centre at North Acton and the continuation and expansion of Park Royal Centre. Each town centre will have its own character and mix of uses that support social interaction and thriving communities. OPDC's town centre hierarchy will need to ensure it maintains its resilience and adaptiveness to changes in the way services are provided, in accordance with Policy SP2.</i> Paragraph 3.41 (unaltered) then refers to <i>Old Oak Major Town Centre</i> , which in the 19.2 version would have been Old Oak Park. MM/PS2/OPDC/SP/20 Paragraph 3.42 now refers to <i>early phases of development to the north of Old Oak South</i> (as compared with north of the Grand Union Canal in the 19.2 version). There are no site allocations for 'early development' to the north of Old Oak South other than (firstly) the 'Oaklands Rise' development, near completion and which is a housing scheme and not a town centre development. The second site at 'Oaklands North' site is expected to be housing-led also. This is one of many examples where a modification of wording as listed in a table of edits may seem fairly innocuous, but which becomes inaccurate or meaningless when inserted into other unaltered text in a 2018 document for which much has changed.	No change proposed. The Development Capacity Study identifies that Old Oak Common Lane Sites (North) are expected to be delivered within the 11-20 year period of the Local Plan, with capacity of 7,400sqm economic floorspace and 300 new homes. This site has not been identified as a site allocation as it does not meet the threshold for homes or commercial floorspace for sites being delivered within the 11-20 year period, however the site capacity has been included within the overall development capacity identified for the plan period.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	99	MM/PS2/OPDC/SP/25	Strategic Policies		SP7	Paragraph 3.46	MM/PS2/OPDC/SP/25 Paragraph 3.46 states <i>The scale of change in transport accessibility will be unique and provides an unparalleled opportunity for transit orientated development.</i> This was inaccurate hyperbole in the 19.2 version and is even more so now. Every Londoner living near a station along the length of the Elizabeth Line will benefit from increased accessibility, and OOC station will not be 'unique' in this respect. Many such stations will offer scope for intensified development on sites more immediately adjacent than will be possible at the OOC interchange and which can more genuinely be claimed as locations for <i>transit-oriented development</i> .	No change proposed. There is a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11) - which is unique to the OPDC area and provides an unparalleled opportunity for car-free development in high PTAL scoring areas to support transit-oriented development.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	100		Strategic Policies		SP7		As a result of the loss of plans for Old Oak North, OOC station will not be accessible by bus, taxi or drop-off from the east. Hence access for longer distance travel via the HS2 and GWR lines will be of value only to a limited number of local residents near the 'western approach' in Old Oak Common Lane. This major change has been played down by OPDC consultation material insisting that ' <i>much of the Plan remains the same</i> '.	No change proposed. The Bus Strategy sets out the approach for servicing Old Oak Common Station, which includes several bus routes to the east - bus routes 7, 220 and 487. Taxis and drop off location has not changed and is accessible to the wider road network, including from the east of the site, from Old Oak Common Lane.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	101	MM/PS2/OPDC/SP/26 MINOR/2/SP7/11	Strategic Policies		SP7		MM/PS2/OPDC/SP/26 and MINOR/2/SP7/11 as modified reads <i>These transport enhancements should enable parts of Old Oak area to achieve a PTAL of 6b to support an optimised approach to development.</i> Which parts of Old Oak? The modified PTAL map in the updated Figures document shows many parts will not achieve 6b PTAL (e.g. Scrubs Lane, Mitre Way Cluster).	No change proposed. Areas of PTAL 6b is shown in Figure 7.11 along Old Oak Common Lane and Victoria Road.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	102	MM/PS2/OPDC/SP/24	Strategic Policies		SP7		Policy SP7 Connecting People and Places – this is a critical strategic policy for the OPDC area. Much of the rationale for establishing a Mayoral Development Corporation was to have a Local Plan which overcame the spatial barriers which have divided the areas since this part of London was first developed in the 19th century. As matters have progressed since 2015, it has become clear that new connections are not going to be able to be created in the way that OPDC once hoped. MM/PS2/OPDC/SP/24 It is essential that a finally adopted Local Plan does not leave the public with false expectations of what can and cannot be achieved in a foreseeable time period. The wording of the 19.2 Policy SP7 has been modified to an extent, but further modifications are needed to convey an accurate picture of what the Local Plan involves. The text in the policy box refers to <i>OPDC's Sustainable Transport Hierarchy and to Key Routes as shown in Figure 3.10</i> . Modified Figure 3.10 is a diagrammatic and highly aspirational map which does not make clear phasing of transport infrastructure, significant parts of which are beyond the plan period (e.g. 'Wormwood Scrubs Street' western section). The new Key Routes Policies Map Figure/PS2/OPDC/PM2 (correctly) shows no new 'key routes' other than a short initial stretch of 'Union Street' at the Oaklands site. The contrast with the similar Key Routes map in the 19.2 documentation is revealing.	No change proposed. The delivery and phasing of key infrastructure show in Figure 3.10 is set out in the Infrastructure Delivery Plan. Infrastructure is phased to be brought forward at the same time as sites are brought forward. The western section of Wormwood Scrubs Street is envisioned to be delivered beyond the plan period because the site in which the infrastructure will serve is anticipated to be brought forward beyond the plan period. However, if this site is brought forward for development sooner, it is appropriate that requirements for Wormwood Scrubs Street are clearly articulated within the Local Plan and the Infrastructure Delivery Plan. Key Routes Policies Map Figure/PS2/OPDC/PM2 has been updated to remove new and indicative routes in accordance with the direction received from the Planning Inspector.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	103		Strategic Policies		SP7		The wording of Our Proposed Outcome overstates what will be possible. It reads: <i>Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</i> The local transport network proposed in the PSDLP can no longer claim to be 'highly connected'. It is little different from the status quo, with the main north/routes of Old Oak Lane/Old Oak Common Lane to the west of the Scrubs, and Scrubs Lane/Wood Lane to the east, remaining as the main routes. Both north south routes are already heavily congested. No viable new east/west route is proposed in the plan period. Development capacity has not been adjusted as a consequence.	No change proposed. There is a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11) - which is unique to the OPDC area and provides an unparalleled opportunity for car-free development in high PTAL scoring areas to support transit-oriented development.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	104	MM//PS2/OPDC/SP/23 MINOR/2/SP7/14	Strategic Policies		SP7		Sub paragraph e) needs further modification (currently it reads <i>Proposals should contribute to a high quality, safe and accessible movement network which delivers and/or contributes to a new and enhanced street network that connects the Places of Old Oak and Park Royal together and connects into the surrounding areas</i> New road connections from the OOC station to the surrounding areas to the east are proposed. Scrubs Lane/Wood Lane and North Kensington are no longer connected to what is still portrayed as a rail interchange with a transformative impact. P7e(ii) reads <i>a new movement network comprised of the key routes as shown in figure 3.10.</i> The wording 'across Old Oak' has been deleted and it was this key route Park Road/Union Way which would have created a 'significant new connection' in the area. MM//PS2/OPDC/SP/23 SP7e (iii) refers to <i>new connections to Old Oak Common Station</i> in the plural. There is now planned to be only one connection to OOC station at the 'western approach' on Old Oak Common Lane. So the plural should not be used (modification needed). SP7 (iv) refers to <i>new and enhanced pedestrian and cycle connections into Wormwood Scrubs</i> ; Where are these to be, and in what sense 'enhanced' beyond some new signage? MINOR/2/SP7/14 As mentioned above the PSMDLP does not provide for any vehicular access to the eastern end of OOC station (a transport hub 1km in length). This is a further consequence of the abandonment of plans for the Cargiant land, and has been recognised by the OPDC Board as a major flaw in the revised proposals. For travellers to reach or depart from this station by bus, car or taxi, the western access on Old Oak Common Lane will be the only means possible. This will add 20 minutes or more to journey times from central London or North Kensington, either through central Harlesden or via Du Cane Road south of Wormwood Scrubs. Policy SP7and its supporting text should make this clear.	No change proposed. There are a number of connections linking the east of the OPDC area by foot, cycle and bus. North Kensington will be linked by the new all-modes Wormwood Scrubs Street, connecting into Scrubs Lane. Scrubs Lane will be upgraded for pedestrians and cyclists adopting the Mayor's Healthy Streets design indicators and following the principles set out in the Scrubs Lane Development Framework Principles supporting study. The Local Plan proposes a new pedestrian/ cycle bridge connecting Scrubs Lane to the eastern entrance of Old Oak Common station via the canal towpath. In addition, the supporting Bus Strategy sets out how bus services will be improved from the east, connecting the areas of Scrubs Lane/ Wood Lane and North Kensington to Old Oak Common station and Willesden Junction station.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	105		Strategic Policies		SP7	Paragraphs 3.47 and 3.48	Paragraphs 3.47 and 3.48 contain no specifics of 'future rail services' in the area and should be deleted unless these new services can be identified.	No change proposed. Future rail services are mentioned throughout the Local Plan, including HS2, Crossrail, the Chiltern Line extension and the West London Orbital.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	106		Strategic Policies		SP7	Paragraph 3.53	Paragraph 3.53 the 'new key routes of Old Oak Street and Wormwood Scrubs Street' are both aspirational and long term projects. This paragraph continues (in unaltered text) The exact location and design of these new streets will need to be informed over time through more detailed work. If OPDC officers cannot by now identify the specific locations and deliverability of these streets after 5 years of work on the Local Plan, should either of the possible future projects feature in the PSMDLP?	No change proposed. The purpose of a Local Plan is not to provide detailed design/outline permission for proposals but to provide policy support to facilitate future design work.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	107	MM/PS2/OPDC/SP/28 MM/PS2/OPDC/SP/29	Strategic Policies		SP7	Paragraphs 3.54 and 3.55	MM/PS2/OPDC/SP/28 and MM/PS2/OPDC/SP/29: the deletions made by these modifications reflect the fact that Old Oak Street will not 'play a particularly important role' as a consequence of changes. So the remaining part of this paragraph becomes an overstatement. Paragraphs 3.54 and 3.55 need redrafting to make clear that 'Old Oak Street' is a long term prospect. See Table of Main Modifications MM/PS2/OPDC/SP/28 which gives a reason for the deletion that Old Oak Street will no longer be able to connect all the Old Oak stations. This conflicts with the Plan setting out a 'potential' OOCL station on Old Oak Common Lane.	No change proposed. Old Oak Street will continue to play an important role in the Local Plan, connecting Old Oak Common Station, Old Oak Common Lane Overground station and North Acton station, creating an important new east-west pedestrian and cycle connection.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	108		Strategic Policies		SP7	Paragraph 3.56	Paragraph 3.56 – at this point in the PSMDLP the document gives a realistic assessment of the phasing and viability prospects for the delivery of 'Wormwood Scrubs Street' as a new east/west 'key route' for 20+ years time. At other points in the PSMDLP documentation the future 'connectivity' of Scrubs Lane is over promised.	Change proposed. Wormwood Scrubs Street will be delivered in two parts - the eastern section will be delivered within the timeframe of the Local Plan - this paragraph has been updated to clarify that delivery for 20+ years is only for part of Wormwood Scrubs Street. The Local Plan aims to improve connectivity at Scrubs Lane by upgrading the street for pedestrians and cyclists, adopting the Mayor's Healthy Streets design indicators and following the principles set out in the Scrubs Lane Development Framework Principles supporting study. The Bus Strategy also sets out how bus services will be improved along Scrubs Lane. A new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station is also proposed following the canal towpath.	Y	117/108
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	109		Strategic Policies		SP7		With a high probability of no new Overground stations and no new movement network across Old Oak, the whole section of the PSMDLP on Policy SP7 and its supporting text needs extensive further redrafting. A more accurate 'proposed outcome' would be 'modest improvements to a congested transport network which will continue to lack east-west connectivity for the lifetime of this Local Plan'.	No change proposed. The Local Plan proposals include substantial improvements to the transport network. Old Oak Common Station will provide a new public transport interchange connecting the OPDC area to central London, Heathrow and the rest of the UK. The plan also includes major upgrades to existing stations and supports the proposed new Old Oak Common Lane Overground station. A Bus Strategy has also been prepared for the Local Plan setting out how the OPDC area will be well served by buses. The Infrastructure Delivery Plan proposes extensive upgrades and new routes to improve walking and cycling across the OPDC area, including new east-west connections, such as the new Old Oak Street linking Old Oak Common station, Old Oak Common Lane station and North Acton station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	110	MM/PS2/OPDC/SP/34	Strategic Policies		SP8		Policy SP8 Green Infrastructure and Open Space – the previously proposed three 2ha 'local parks' has been reduced to two. The open space newly proposed for the Channel Gate/Atlas Road sites will have the limitation of being cut off from the north-west and north-east by rail lines. It will not be an easily accessed and well-connected open space. This ought to be made clear.	No change proposed. New and enhanced connections at Channel Gate will ensure that the new Local Park will be accessible and well connected to surrounding areas, particularly to the north (through Old Oak Lane) east and south, while the Grand Union Canal will provide an important connection to the west in advance of a potential future crossing of the Dudding Hill line, beyond the plan period.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	111		Strategic Policies		SP9		<p>Policy SP9 on Built Environment – this section of the PSDLP is left very largely unchanged from the 19.2 version. Part b) of the Policy reads <i>Proposals should optimise development in a sustainable manner, that delivers high densities and a range of building heights, including tall buildings in the locations identified in figure 3.15.</i></p> <p>We believe that the PSMDLP generalised approach to ‘high densities and a range of buildings heights’ (even when combined with material in ‘Place’ chapters of the document) fails to recognise the implications of the late modification to the 2021 London Plan Policy D9 on Building Heights. This followed the December 2020 intervention by the Secretary of State. We believe that as a consequence, the OPDC Local Plan will need to include more than a map and a list of site allocations when justifying the locations of proposed tall buildings.</p> <p>We think that it will need to be demonstrated in the Local Plan that any individual site where a tall building is contemplated is ‘suitable’, taking account of the breadth of criteria for ‘suitability’ as set out in London Plan Policy D9. These include ‘functional’ and ‘environmental’ impacts of tall buildings as well as ‘visual’ impacts’.</p> <p>Legal debate is continuing on the implications of the acceptance by the Mayor of London of the addition of the word ‘suitable’ to previous London Plan Policy D9. We share the view of Russell Harris QC5 that this Direction is a significant shift in Government policy on tall buildings in London. Coupled with the clear ‘Direction Overview’ from the Secretary of State6, new London Plan Policy D9 introduces a presumption against tall buildings except at locations positively identified, with a stated rationale behind such a justification that reflects the site context and its surroundings. We also think that Local Plans in London will in future need to show a rationale for abrupt changes in the character of an area, from low rise to buildings of 20-40 storeys. ‘Gentle density’ is the Government’s direction of travel, except at locations identified as suitable in all respects. Reliance on a claimed need for ‘optimisation’ of sites, even in Opportunity Areas, we do not see as being sufficient,</p> <p>If OPDC remains intent on introducing very high-density housing at what seem to be all the housing sites listed at Table 3.1 as site allocations (MM/PS2/OPDC/SP/38), we believe that additional work and further modifications will be required to achieve London Plan conformity.</p> <p>5 Landmark Chambers seminar on the implications of New London Plan policy D9 February 2021.</p> <p>6 The Direction Overview for this modification to London Plan D9, as set out in the Secretary of State’s letter to the Mayor Of London of 9th December 2020 reads This Direction is designed to ensure that there is clear policy against tall buildings outside any areas that boroughs determine are appropriate for tall buildings, whilst ensuring that the concept of gentle density is embedded London wide.</p>	<p>No change proposed. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC’s Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	112	MMPS/OPDC/M4	Strategic Policies		SP9	Paragraph 3.78	<p>Housing density MMPS/OPDC/M4 and Paragraph 3.78: Ever since revisions to the Regulation 18 version, the OPDC Draft Local Plan has lacked a clear and justified policy on housing density. Paragraph 3.79 of the 19.2 version stated <i>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. A single additional sentence has been inserted as a modification. This reads The indicative density range is 300 to 600 units per hectare.</i></p> <p>This seems an unacceptable way of introducing, let alone justifying a Local Plan approach to density which will have huge consequences for the future built environment at Old Oak. On its own and as part of supporting text, we do not see that this added sentence cannot be relied on or cited as 'policy' or carry any material weight. It is also ingenuous. The reality is that no scheme approved by OPDC to date has been at less than 400 dph and the range of OPDC planning consents has extended to 800 dph (at 2 Scrubs Lane). Consents granted by LB Ealing on behalf of OPDC have been at even higher densities.</p> <p>The relationship between housing densities and tall buildings was discussed at the 2019 examination of the 19.2 Draft Local Plan. Local organisations (OONF and StQW Forum) provided submissions and OPDC responded with evidence on comparables in other parts of London. Agreement was not reached on this evidence.</p>	<p>No change proposed. OPDC considers that the information provided for densities within the Local Plan is clear and sound. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Development Capacity Study (DCS) Update methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The precedents drawn from across London remain relevant. The precedents from the OPDC also remain relevant which a number of these having been implemented.</p> <p>Development capacities of sites are based on the methodology set out in the DCS Update which includes input from other OPDC supporting studies. This has informed the density range set out in the DCS Update and the Local Plan. The indicative density range is 300 to 600 u/ha.</p> <p>Development proposals will be determined using relevant development plan documents and material considerations.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	113	MM/PS2/OPDC/P9/1	Strategic Policies		SP9		<p>The planning context has changed between 2019 and the 2021 PSMDLP. The Secretary of State intervened in December 2020 to set new requirements on tall buildings in the 2021 London Plan. The forecast levels of access to public transport have dropped significantly for parts of the OPDC area where very high densities have already been consented (Scrubs Lane). Objections that these applications were premature were brushed aside by OPDC. Events have shown that such objections were very valid, given a complete change of direction for Old Oak North and Scrubs Lane. Channel Gate/Atlas Road has been newly identified as an area appropriate for tall buildings while lacking proximity to Overground/Underground stations and to local amenities. MM/PS2/OPDC/P9/1</p> <p>OPDC has already demonstrated its wish as a planning authority to retain discretion to grant consent to schemes at what have long been seen in the UK as 'superdensities' and 'hyperdensities'. OPDC decisions on planning consents on four schemes in Scrubs Lane were made on assumed PTAL levels which will not now materialise. The 2015 OAPF remains in force as an adopted SPD to the London Plan. Figure 45 of this document identified 'sensitive edges' as requiring 'lower densities' of 300 dph. Throughout the Regulation 18 and 19 consultations, there has been no evidence of public support for densities of 400-600 as an average for Scrubs Lane. In 2020 and 2021 OPDC has granted further planning consents on the schemes at Mitre Yard (under S73) and at North Kensington Gate (South). Both of these added a further 40 or more housing units. These consents have added to mass, height and density at a location no longer to be adjacent to 'Old Oak Park' or to a new Overground station at Hythe Road.</p>	<p>No change proposed. OPDC consider that the information provided for densities within the Local Plan is clear and sound. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the 2021 London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Development Capacity Study (DCS) Update methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The precedents drawn from across London remain relevant. The precedents from the OPDC also remain relevant which a number of these having been implemented.</p> <p>Development capacities of sites are based on the methodology set out in the DCS Update which includes input from other OPDC supporting studies. This has informed the density range set out in the DCS Update and the Local Plan. The indicative density range is 300 to 600 u/ha.</p> <p>Development proposals will be determined using relevant development plan documents and material considerations.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	114		Strategic Policies		SP9		<p>Average densities of 600 units/hectare were proposed in the now redundant 2018 Old Oak North Development Framework Principles document. When applied over large areas of land, 'averages' at this level involve building typologies completely alien to London except in a few locations which are outliers to London norms (such as the Isle of Dogs Greenwich Peninsular, and now North Acton within the OPDC area7).</p> <p>7 See a series of studies on housing density including Tapping the Potential: assessing urban capacity – towards better practice DETR December 2000, Superdensity – The Sequel 2016, The Homes London Needs Nicholas Boys-Smith February 2016, Growing London – Mayors Design Advisory Group (undated). The growing clusters of towers at North Acton (up to 54 and 55 storeys to date) have been consented by LB Ealing under a Scheme of Delegation from OPDC,</p>	<p>No change proposed. The proposed modifications propose the retention of Strategic Industrial Location within Old Oak North.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	115		Strategic Policies		SP9		<p>Given the outcome of the Building Better, Building Beautiful Commission, the proposed NPPF changes, the publication of a National Model Design Code, and the Secretary of State's December 2020 intervention on the London Plan, we consider that the 2021 planning context has changed and that this national direction of travel needs to be reflected in a modified OPDC Local Plan.</p>	<p>No change proposed. As part of the transition arrangements OPDC's Local Plan is being assessed against the 2012 NPPF.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the 2021 London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	116		Strategic Policies		SP9		<p>• In 2021 and with Government promoting 'gentle density we consider it very unsatisfactory to see a Local Plan, covering a large area of redevelopment in north west London, with a complete absence of any explicit policy and a map on expected housing densities. This is not 'clarity' in a Local Plan. As has been seen in practice, it leaves interpretation wide open, when individual applications come to be determined.</p> <p>• The Regulation 18 OPDC Draft Local Plan included such map and a related set of density ranges, as does the still adopted 2015 OAPF.</p> <p>NB Figure 45 Indicative density levels from 2015 OAPF for OPDC area depicted</p>	<p>No change proposed. The information provided for building heights within the Local Plan is considered to be clear and sound. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Development Capacity Study (DCS) Update methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The precedents drawn from across London remain relevant. The precedents from the OPDC also remain relevant which a number of these having been implemented.</p> <p>Development capacities of sites are based on the methodology set out in the DCS Update which includes input from other OPDC supporting studies. This has informed the density range set out in the DCS Update and the Local Plan. The indicative density range is 300 to 600 u/ha.</p> <p>Development proposals will be determined using relevant development plan documents and material considerations.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	117		Strategic Policies		SP9		<p>We are unhappy that OPDC has for the third time included a table of Site Allocations with specific identified sites and specific housing numbers, while refusing to add a column that shows resultant housing density figures (even within a range).</p> <ul style="list-style-type: none"> While density figures do not always give an accurate indication of resultant built forms, they remains a long established means of assessing the extent to which a housing scheme will prove sufficient access to open space, childrens play space, and social infrastructure. 	<p>No change proposed. The information provided for densities within the Local Plan is considered to be clear and sound. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p> <p>The Development Capacity Study (DCS) Update methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The precedents drawn from across London remain relevant. The precedents from the OPDC also remain relevant which a number of these having been implemented.</p> <p>Development capacities of sites are based on the methodology set out in the DCS Update which includes input from other OPDC supporting studies. This has informed the density range set out in the DCS Update and the Local Plan. The indicative density range is 300 to 600 u/ha.</p> <p>Development proposals will be determined using relevant development plan documents and material considerations.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	118		Strategic Policies		SP9		<p>We have raised this point in responses to each of the consultation exercises, and at the EIP in 2019. In a 1st February 2021 Zoom session with OPDC planning officers authoring the Plan, OPDC officers confirmed that additional information on densities would not be added to this table. For what justifiable reason?</p> <p>In response to evidence and submissions on densities and tall buildings at the 2019 EIP, the Inspector required in his note on Session 4 <i>OPDC to include text from glossary on density ranges within the Plan itself at SP9</i>. The Glossary to the 19.2 Draft Local Plan read <i>Indicative housing density range has been provided to enable OPDC to define development capacity in accordance with national guidance. Within the OPDC area the indicative density range is 300 (low density) to 600 (high density) units per hectare</i>.</p> <p>Only part of this wording has been added to the text of SP9, and not to the policy itself.</p>	<p>No change proposed. The information provided for densities within the Local Plan is considered to be clear and sound. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p> <p>The Development Capacity Study (DCS) Update methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The precedents drawn from across London remain relevant. The precedents from the OPDC also remain relevant which a number of these having been implemented.</p> <p>Development capacities of sites are based on the methodology set out in the DCS Update which includes input from other OPDC supporting studies. This has informed the density range set out in the DCS Update and the Local Plan. The indicative density range is 300 to 600 u/ha.</p> <p>Development proposals will be determined using relevant development plan documents and material considerations.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	119		Strategic Policies		SP9		<p>The consultation version of the National Model Design Code shows examples of urban building typologies and their relationship to density, as set out below.</p> <p>NB Figure from Draft National Model Design Code, illustrating typologies for urban buildings and related density depicted.</p> <p>In any event, this density range of 300-600 is far too broad, when applied across the whole OPDC area to constitute a serious 'policy' on density. What national guidance is being referred to by OPDC? What recognition of New London Plan Policy D9? What criteria used to define 'suitable' locations for tall buildings? (see also below on the updated Tall Buildings Strategy).</p>	<p>No change proposed. The information provided for densities within the Local Plan is considered to be clear and sound. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>Stakeholders raised points on providing additional density information in the Local Plan at the Hearing Session 4. Following the discussion the Inspector required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p> <p>The Development Capacity Study (DCS) Update methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The precedents drawn from across London remain relevant. The precedents from the OPDC also remain relevant which a number of these having been implemented.</p> <p>Development capacities of sites are based on the methodology set out in the DCS Update which includes input from other OPDC supporting studies. This has informed the density range set out in the DCS Update and the Local Plan. The indicative density range is 300 to 600 u/ha.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	120		Strategic Policies		SP9		<p>OPDC Planning Committee decisions on the four schemes consented to date along Scrubs Lane are noted below8.</p> <p>8 These schemes are Mitre Yard (S96A and S73 revised consent at 455 dph January 2020, North Kensington Gate (South) new and 'optimised' OPDC consent at 547dph January 2021, 2 Scrubs Lane at 776 dph 2017, North Kensington Gate (North) at 440 dph 2017. Construction has yet to start on any of these developments as of July 2021. Mitre Yard has seen demolition work in recent weeks (City & Docklands). Developers at 2 Scrubs Lane (Fruition Properties) sought to vary pre-construction planning conditions, and to evict the City Mission church, prior to the expiry of their 2018 planning consent on June 22ns 2021.</p>	Noted.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	121		Strategic Policies		SP9		Subject to the outcome of MHCLG consultation, proposed amendments to NPPF paragraph 73c) <i>will expect Local Plans to set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community.</i> We appreciate that the PSMDLP is being examined against the 2012 version of the NPPF but ask that the Government's direction of travel is taken into account.	No change proposed. OPDC's Local Plan is being assessed against the 2012 NPPF as part of transitional arrangements. However, Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	122		Strategic Policies		SP9		In the Draft national Model Design Code, a housing density of over 120 dwelling/hectare is categorised as a 'typical dense city typology with a strong mix of uses'. A neighbourhood with net housing densities of 60-120 dph and a mix of uses is described as 'urban'. Why does the PSMDLP not view a future Scrubs Lane and a future Channel Gate/Atlas Road as being 'urban neighbourhoods' with building typologies that will allow National Design Code aspirations to be met? Instead the PSMDLP (in a single sentence not incorporated in any specific 'policy') promotes densities four times as great.	No change proposed. The Local Plan provides an indicative density range of 300 to 600 units per hectare. This is based on the evidence set out in the Development Capacity Study (DCS) Update. The development capacity set out in the proposed modifications has been defined by a design-led and plan-led process evidenced in supporting studies. The DCS Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. As part of transition arrangements, OPDC's Local Plan is being assessed against the 2012 NPPF.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	123		Strategic Policies		SP9		The Old Oak Neighbourhood Forum, in relation to its work on a draft neighbourhood plan, has been given by OPDC a working figure of 520 dph net, as having been used in capacity studies for the Channel Gate/Atlas Road sites. This figure is not included as part of the PSMDLP. OPDC has published overleaf an image of a future Channel Gate/Atlas Road with 3,100 new homes based on PSMDLP policies. Public reaction to this has been very adverse.	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The development capacity set out in the proposed modifications has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study (DCS) Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>The Local Plan provides an indicative density range of 300 to 600 units per hectare. This is based on the evidence set out in the DCS Update.</p> <p>Stakeholders raised points on providing additional and site specific density information in the Local Plan at the Hearing Session 4. Discussions at the hearing included the appropriateness of including detailed density information in light of site specific considerations for defining site densities that cannot be appropriately considered at a Local Plan level and the design-led approach set out in the then emerging draft London Plan. The Inspector considered the approach provided in the Local Plan was appropriate and required OPDC to include text from the glossary on density ranges within the Plan itself at SP9. This is provided in paragraph 3.78.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	124	MMPS/OPDC/M4v	Strategic Policies		SP9	Paragraph 3.78	MMPS/OPDC/M4v Paragraph 3.78 of the PSMDLP has text unaltered from the 19.2 version. This reads <i>The proposed level of investment in transport infrastructure and the planned public transport accessibility improvements, on a brownfield site in zone 2/3 west London, provides a strong rationale for the design and delivery of new high density development including new tall buildings in appropriate locations. 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.</i> Evidence from ODPC Planning Committee decisions to date, and from those decisions which LB Ealing has taken since 2015 on OPDC's behalf, show that average residential densities are likely to be well above 450 units per hectare, in the main areas of concentrated development (Scrubs Lane, Channel Gate, Acton Wells and North Acton).	<p>No change proposed.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL.</p> <p>The Local Plan provides an indicative density range of 300 to 600 units per hectare. This is based on the evidence set out in the DCS Update.</p> <p>The development capacity set out in the proposed modifications has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study (DCS) Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	125		Strategic Policies		SP9	Paragraph 3.78	<p>In the transition from the 19.2 Draft Plan to the 2021 PSMDLP version, anticipated 'average densities' for housing have moved upwards while nearly all of the previously proposed new transport infrastructure has disappeared from the Plan (other than OOC station itself). The strong rationale cited in unmodified parts of paragraph 3.78 above has disappeared. OPDC's justification then falls back on the 3.78 statement that Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area.....</p> <p>The fact that modelling shows this outcome, indicating that extreme densities must therefore be pursued, is not acceptable as a justified process of rational, sound and effective spatial planning. It is the result of simplistic 'capacity studies' and an arithmetical exercise on how many units can be positioned on given plots of land. In OPDC's case, this leads to an almost universal reliance on buildings which range from 'tall' (under the 2021 London Plan definition) to very tall. Broad areas and locations are then deemed as 'appropriate' for such buildings with no accompanying specific methodology or site-by-site examination of 'suitability'.</p>	<p>No change proposed. The indicative density range defined in the Development Capacity Study (DCS) Update and set out in the Local Plan has not been updated since submission.</p> <p>The development capacity set out in the proposed modifications has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study (DCS) Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This includes input from a range of supporting studies. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	126		Strategic Policies		SP9		<p>We are aware that developers Pocket Living have purchased part of the Channel Gate site for a scheme of 400 Build to Rent Units. Whether these plans take into account the fact that the site immediately across the canal remains part of plans by the West London Waste Authority, and that London Plan D9 is now in force, remains to be seen.</p> <p>NB OPDC late 2020 consultation image depicted showing Channel Gate/Atlas Road development shown in pink. Oaklands development (nearing completion) shown in blue</p>	<p>No change proposed. Development proposals will be determined using relevant development plan documents and material considerations.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	127		Strategic Policies		SP9		<p>As a consequence, we view Policy SP9 and its supporting text as unsound and failing to take account of the updated Policy D9 in the 2021 London Plan. More broadly, London Plan Policy SD1 sets out London Plan policies for Opportunity Areas. We consider that the PSMDLP falls down in relation to SD1 <i>which states Boroughs, through Development Plans and decisions, should: 1) clearly set out how they will encourage and deliver the growth potential of Opportunity Areas.</i> The PSMDLP is not clear, and has been left as deliberately unclear in respect of the points made above.</p>	<p>No change proposed. OPDC considers that the proposed modifications are consistent with national policy set out in the 2012 NPPF and the NPPG delivering a sound Local Plan.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the 2021 London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The Local Plan provides clear policy guidance and site allocation information to deliver the growth potential of the Old Oak and Park Royal Opportunity Area. The proposed modifications have been informed by a design-led and plan-led process evidenced in supporting studies.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	128		Strategic Policies		SP10		Modifications proposed by OPDC to this section of the PSDLP are limited, as much of the text refers across to Chapter 11 and the updated Infrastructure Delivery Plan (see representations below). The key modifications are to the housing and employment numbers in the table of site allocations at 3.1. Table 3.1 appears to omit the site at 2 Scrubs Lane, where consent was granted by OPDC in June 2018 for a 20 storey residential tower with 65 housing units (now lapsed).	No change proposed. 2 Scrubs Lane is identified as a development site within the Development Capacity Study Update. The site does not meet the criteria set out in paragraph 3.82.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	129	MM/PS2/OPDC/SP/36	Strategic Policies		SP10		MM/PS2/OPDC/SP/36 Paragraph 3.80 continues to refer to sites to be 'decked over'. Which are these, of the sites listed in Table 3.1?	No change proposed. This is a general statement.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	130	MM/PS2/OPDC/P2/1 MM/PS2/OPDC/P9/1	Places				Most of the 'Places' chapters in the PSMDLP are not the subject of extensive modifications. But those for Old Oak North, Channel Gate and for Scrubs Lane are the subject of very extensive changes or entire redrafts. As noted in our Part 1 representations, this begs questions on the point at which a Local Plan undergoing 'modification' at submission stage becomes in reality an exercise in extensive further 'preparation'. The fact that the extensive new wording, introduced as 'modifications' for all three of these 'Places' is not included in the OPDC Table of Modifications is in our view seriously misleading. It would be all too easy for a local resident who takes the trouble to read through this key document not to become aware of these three sections of new text. These are the most fundamental of the changes between the 2018 and 2021 versions. MM/PS2/OPDC/P2/1, MM/PS2/OPDC/P9/1, MM/PS2/OPDC/P10C5/1	No change proposed. The proposed modifications will continue to enable the Local Plan to support the delivery of sustainable high quality development in the OPDC area. The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. For the proposed modifications to policies P2 (Old Oak North) and P9 (Channel Gate), the Table of Main Modifications makes reference to the changes to these policies and directs the reader to the modified Local Plan. This reflects the significant rewrites of these policies. For the proposed modifications to policy P10 (Scrubs Lane), the Table of Main Modifications sets out the proposed modifications.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	131		Places				<p>These 'Place' sections in Chapter 4 of the PSMDLP make no attempt to distinguish between 'strategic' and 'non-strategic' policies within their content. This does not comply with 2012 NPPF paragraphs 156, 184 and 185. On the face of it, much of the policy content of these chapters is 'non-strategic' in terms of NPPG criteria.</p> <p>If OPDC is unwilling or unable to provide as part of the PSMDLP a table indicating which of the Plan's policies are 'strategic' and 'non-strategic' (as the NPPF requires) then we seriously question whether the Chapter 4 sections of the document should remain in an adopted Local Plan. This level of prescription and detail on non-strategic matters is not what Local Plans are intended for.</p> <p>Chapter 4 should explain why OPDC has felt it necessary to prepare a Local Plan that includes strategic and extensive non-strategic policies. The level of detail in many of the Place policies goes way beyond what other London Boroughs include in their recent Local Plans (e.g. City of Westminster, Tower Hamlets, Hackney).</p>	<p>No change proposed. OPDC's definition of strategic policies is considered to be consistent with national policy.</p> <p>The proposed modifications did not amend OPDC's definition of strategic policies.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	132	MM/PS2/OPDC/P1/1 MM/PS2/OPDC/P1/10	Places		P1		<p>MM/PS2/OPDC/P1/1 The wording of Policy P1 Old Oak South remains largely unchanged, including sub-policy e) which reads <i>Contributing to the delivery of Old Oak major town centre by delivering a range of town centre uses, including top-up convenience stores, cafés, bars, restaurants, social infrastructure, business hotels and comparison retailers, that meet needs of employees, residents and interchange passengers</i>; As noted above, this 'Old Oak major town centre' now appears to be perceived by OPDC as an extended 'crescent shaped' area spreading from North Acton to Channel Gate MM/PS2/OPDC/P1/10. Each of these two locations are at a distance of 1km or more from OOC station.</p> <p>On diagrammatic maps used by OPDC for consultation and presentation to its Board the area around and north of the station is shown as 'Old Oak Major Town Centre'. This is causing confusion amongst local people. The PSMDLP documentation is internally inconsistent between its maps and text.</p> <p>On the main Local Plan Policies Map Figure/PS2/OPDC/PM1 as modified for renewed examination, no town centres are shown other than in Park Royal and at North Acton. On the Policies Map Town Centres Figure/PS2/OPDC/PM4 in the Figures Modifications, similarly no town centres are shown other than in Park Royal and at North Acton.</p> <p>On the Policies Map Spatial Vision Figure/PS2/OPDC/2.2 a note states <i>Old Oak major town centre removed from Old Oak North and repositioned to include Atlas Junction and part of Channel Gate</i>; A large patch is shown in red/grey hatching, as was used for the 19.2 Plan but in a different place.</p> <p>It is small wonder that, when combined with other conflicting statements in sections of the PSMDLP about other parts of the major town centre as referred to earlier, the public do not understand what is now meant by Old Oak Major Town Centre.</p>	<p>No change proposed.</p> <p>As a future town centre, the exact boundaries for Old Oak Major Town Centre are not yet defined, and the boundary shown within the Local Plan figures are indicative. As stated in the summary of changes for Figure/PS2/OPDC/PM, Old Oak major town centre has been removed from the policies map, but is shown in Local Plan figures 2.2, 3.7 and 10.3. This is due to a request by the Inspector to remove indicative boundaries from the Policies Map.</p> <p>The change in boundary for the major town centre/commercial centre shown in red/grey hatch on figures 2.2, 3.7 and 10.3 reflects final proposals for the design and layout of Old Oak Common Station, which was yet to be confirmed at the time of Regulation 19.2 draft Local Plan.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	133		Places		P1		We do not believe that significant numbers of OOC station 'interchange passengers' will wish to walk along an unappealing section of Old Oak Common Lane to reach Channel Gate/Atlas Road. Reaching North Acton is an even further walking distance, until such time as an 'Old Oak Street' bridges the wide barrier of railway lines. Why would either location attract GWR or HS2 passengers, if central London locations can be reached within minutes by Crossrail?	No change proposed. Old Oak Common Station will be the largest new station to built in the UK in over a century. Together with regeneration of the surrounding area, this will result in the area becoming a key new destination for people to work, live and play.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	134	MM/PS2/OPDC/P1/7	Places		P1	Paragraph 4.6	MM/PS2/OPDC/P1/7 Paragraph 4.6 As noted previously the National Infrastructure Commission and HS2 both give 2029-33 as a the expected date for opening of HS2. The reference to 'local connections' to the Overground' needs to be removed in a description of the HS2 interchange.	No change proposed. Given the uncertainties of the opening of HS2 reference to dates has been removed. The proposed Old Oak Common Lane station provides local connections from Old Oak Common station to the Overground, located less than 5 minute walk away. Old Oak Common Lane station has a strong business case given its role in providing wider connectivity to west London for passengers from Old Oak Common station, and TfL are in discussions with national government, HS2, Network Rail and others in relation to funding.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	135	MM/PS2/OPDC/P1/10	Places		P1	Paragraph 4.12	MM/PS2/OPDC/P1/10 Paragraph 4. 12 is proposed to be modified to read <i>Town centre uses should also complement and connect with other sections of this new town centre located within Old Oak Lane and Old Oak Common Lane (P8), Channel Gate (P9) and North Acton and Acton Wells (P7)</i> . We do not see that 'sections of a new town centre' can be dispersed so widely. The term 'town centre' is being used in a way that has lost its common meaning, in attempts to 'modify' previous text on a subject where the underlying reality is one of major spatial changes to a previous Draft Plan.	No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	136	MM/PS2/OPDC/P1/16	Places		P1	Paragraph 4.16	MM/PS2/OPDC/P1/16 Paragraph 4.16 as modified reads <i>Delivering Old Oak Street as a high quality route will be particularly important for connectivity as well as providing walking and cycling access to the Scrubs Lane</i> . The 'the' is superfluous. This sentence can be read two ways. Scrubs Lane is on the eastern side of Wormwood Scrubs and has nothing to do with Old Oak Street, which is shown as connecting OOC station to North Acton. Presumably the sentence is intended to read that 'walking and cycling access to Scrubs Lane' is also 'important' rather than as Old Oak Street having anything to contribute to the connectivity of Scrubs Lane? It needs redrafting for clarity and this is one of many examples where modifying sections of text leads to sentence structures which render content near meaningless.	Change proposed. The additional 'the' will be removed. No change proposed. OPDC considers the proposed modification is effective in demonstrating the importance of connectivity of providing walking and cycling access to Scrubs Lane. Figures 4.2 and 4.5 illustrate this further through depicting the location of Old Oak Street.	Y	117/136
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	137		Places		P1	Paragraph 4.19	Paragraph 4.19 has not been modified and reads <i>As such, the station will act as a major catalyst for the development of the OPDC area, placing Old Oak South at the heart of one of the UK's largest regeneration projects, with the opportunity to become a new London destination</i> . Apart from OOC station itself, and possibly the Adjacent Site as and when safeguarding is removed and Sites 23 and 24 (Oaklands) it is not evident that this 'new London destination' will realistically emerge in the plan period for the PSMDLP. Reviews of the Local Plan in five and ten years time will be the stage at which such claims could perhaps be justified. Stratford and the former Olympic Park have already proved successful in attracting universities and major cultural establishments to create 'Olympicopolis' in east London. In the years since 2015, no evidence has emerged that the OPDC will achieve a similar outcome at Old Oak. The 'London destination' ambition should now await the proven outcomes of opening OOC station in the 2030s, rather than forming the basis of a Local Plan that risks encouraging relatively random development of sites within no coherent overall spatial planning framework.	No change proposed. The proposed modifications did not amend this part of the Local Plan. OPDC considers that the Local Plan has been positively prepared, is effective and results from a justified plan-led process that will deliver sustainable development and achieve the Local Plan's Spatial Vision. It is appropriate for a 20 year Local Plan to set the tone for the aspirations over the entire 20 year period, else it would not be plan vision but rather a statement setting out the current circumstances for an area.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	138		Places		P1C1		Policy PC1 Old Oak Common Station Cluster - Again, we question whether an aspiration that this location <i>will become a destination at the heart of a new major town centre and commercial centre for London</i> can justifiable remain unaltered in a final 2021 Local Plan? The currently proposed extended major town centre and commercial centre will not be at OOC station.	No change proposed. The proposed modifications did not amend this part of the Local Plan. OPDC considers that the Local Plan has been positively prepared, is effective and results from a justified plan-led process that will deliver sustainable development and achieve the Local Plan's Spatial Vision. The Old Oak Common Station and adjacent station site was identified to be part of the Old Oak major town centre and commercial centre in the submission Local Plan and continues to be identified as part of it. This continues to be depicted in figures 2.2, 3.7 and 10.3.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	139		Places		P1C1		Sub paragraphs c) and d) of this policy PC1 are now redundant. The station has been designed, consent granted for the building and its surroundings, and the building is under construction.	No change proposed. The paragraph is still accurate as there are still further Schedule 17 applications to be submitted by HS2 for the station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	140		Places		P1C1		The supporting text at 4.21 to 4.30 could be significantly shortened, for the same reasons. The design phase of the station is now long past.	No change proposed. The paragraph is still accurate as there are still further Schedule 17 applications to be submitted by HS2 for the station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	141	MM/PS2/OPDC/P2/1 MM9/PS/Q5(2) MM10/PS/Q5(4) MINOR/PS/General1	Places		P2		Policy P2 Old Oak North – this has been entirely redrafted from the 19.2 version. The new 'vision' describes the future of the area as a <i>vibrant industrial location that people will want to work in, visit and pass through</i> . Visitors will indeed continue to come to the Cargiant business and other outlets on the industrial estate. We are not clear on the 'pass through' addition? Pass through to where? What routes in or out of the industrial estate will there be, other than the existing vehicle entrance/exit onto Scrubs Lane?	No change proposed. Policy P2 (Old Oak North) supports improvements to walking and cycling routes, including the route from Willesden Junction Station into Old Oak North and routes to and over the canal. The policy also supports development along walking and cycling routes that create positive and active frontages, including attractive and/or lively ground floor uses.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	142		Places		P7	Vision	The 'vision' in the main policy box is that North Acton and Acton Wells will be a high density mixed use area accommodating tall buildings in appropriate locations. It is early days in the life of the new administration at LB Ealing. Council Leader Peter Mason has made very clear commitments to review LBE policy on Tall Building, in the light of rapidly growing public resistance to the approach which the Council has taken in recent years. We wait to see how LBE will approach the preparation of its own Local Plan to replace very outdated 2012/2013 development plan documents. We also wait to see whether the OPDC Scheme of Delegation to LBE remains in its present form, when the Council is reconsidering its stance on OPDC plans for North Acton and East Acton. Proposals for two further very tall buildings at North Acton (1 Portal Way and the Castle pub Site) remain at pre-application stage.	No change proposed. OPDC's Local Plan policies P7 and P7C1 provide specific guidance for North Acton. The modified Local Plan policies P7 and P7C1 relating to North Acton continue to require high quality high density development in North Acton. Policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified. OPDC provided verbal and written responses to the questions raised in the chat facility at the consultation events.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	143	MM/PS2/OPDC/P7/2A	Places		P7	Paragraph 4.109	MM/PS2/OPDC/P7/2A Paragraph 4.109 states <i>OPDC will also employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other appropriate developments (see Policy SP10)</i> . Since delegating to LB Ealing in April 2015 all decisions on applications at North Acton, OPDC has notably failed to involve itself on decisions on the allocation of S106 receipts flowing from major developments consented. Neither OPDC nor Ealing has put in place a CIL regime.	No change proposed. OPDC and the host boroughs meet regularly to manage planning obligations funding to meet local priorities. Spend proposals for S106 monies secured from schemes in North Acton are approved by OPDC, in accordance with OPDC's Scheme of Delegation Protocol for handling planning applications and other planning related functions https://www.london.gov.uk/moderngovopdc/documents/s58660/5.%20BAP%20CEO%20Report%20-%20App%20A%20-%202024.6.20.pdf	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	144		Places		P7	Paragraph 4.102	Paragraph 4.102 states <i>The public realm within North Acton is currently of a poor quality and lacks coordination between different development sites. For an emerging high density area, creating a high quality public realm is fundamental to the delivery of a high quality place</i> . Such a comment is sadly too late in the day for North Acton. Three years on since the 19.2 Draft Plan was written this 'high density area' has 'emerged' all too clearly on the London skyline, as a result of LBE decisions delegated by OPDC. The public realm has indeed proved to be windswept, overshadowed and remains 'of poor quality'. Successful 'activation' of grounds floors of tower blocks remains an unfulfilled aim.	No change proposed. Various development proposals are set to be brought forward in North Acton during the Local Plan period and it is appropriate to outline policy requirements for improving the public realm over the Local Plan period	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	145		Places		P7	Paragraph 4.120	Paragraph 4.120 should explain that the developments referred to have already been consented, and in some cases built. And that OPDC has since 2015 delegated to LB Ealing the determination of all planning applications at North Acton. At the moment there remains much public confusion as to which planning authority has been responsible for consenting these developments	No change proposed. Modifications to paragraph 4.120 are not proposed. OPDC considers the paragraph is sound and that the Local Plan reflects the most up to date development information at the point of writing.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	146	MM/PS2/OPDC/P8/1	Places		P8	Vision	MM/PS2/OPDC/P8/1 The previous 19.2 Plan P8 'vision' of a place that mediates between the comprehensive mixed use redevelopment of Old Oak and the industrial intensification in Park Royal and Channel Gate made some sense and was supported by local people in responses at Reg 18 and 19 stage. As 'modified' it is hard to accept as accurate the retention of the term 'sensitive integration' in relation to changed plans for Channel Gate.	No change proposed. OPDC considers the proposed modification is justified and reflects the updates to land use designations in Channel Gate and Old Oak North made in response to the Inspector's Interim Findings.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	147		Places		P8		Under public realm and movement, the P8 policy 'box' sub paragraph ii) still refers to the abandoned plans for 'Union Way' as a through route. Sub-paragraph iii) refers to <i>widening Old Oak Common Lane to include generous footpaths and segregated cycle lanes</i> . OPDC on January 14th 2021 consented to a S17 application from HS2 for works to the bridge across Old Oak Lane. This involves no widening of the bridge and includes a cycleway but at the cost of removing the pavement from one side of the road, forcing pedestrians to cross the roadway. This part of Policy P8 needs updating.	Change proposed. Reference to Union Way has now been removed as segregated cycle lanes are not required for a no-through route. Due to the engineering constraints at the bridges, Old Oak Common Lane is not able to be widened at these pinch points. However, it is OPDC's aspirations to widen the rest of Old Oak Common Lane as development sites come forward.	Y	117/147

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	148		Places		P8		Paragraph i) in the policy box refers to a <i>variety of building heights</i> at certain locations, with no indication of the range of heights being considered (which could be from 10-50 storey on experience to date of consents granted by OPDC and LBE on the Corporation's behalf). We do not think this sub-paragraph of policy complies with 2021 London Plan Policy D9, without further reference to criteria for 'suitability' for tall buildings.	No change proposed. Modifications were not proposed for policy P8(i). OPDC considers the policy is sound and in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	149	MM/PS2/OPDC/P8/1	Places		P8C1		MM/PS2/OPDC/P8/1 Policy P8C1 Atlas Junction Cluster - the proposed modification in the policy box defines this location as part of Old Oak Major Town Centre. Further modifications are therefore needed to the 'vision' and detail of this policy P8C1. The supporting text was prepared for the 19.2 version, when referring to a proposed neighbourhood centre at Atlas Junction. It now makes little sense when as modified is referring to this location being part of 'the Major Old Oak Town Centre'. Were it possible to bring forward extensive new development along both sides of this section of Old Oak Common Lane (as would have been the case for 'Old Oak High Street' at Old Oak North) a continuous but fairly concentrated 'centre' would have been plausible as a viable retail, office, cultural, and entertainment location immediately north of OOC station and extending to Channel Gate. But Old Oak Common Lane does not lend itself to this approach. On the east side of the road is the Nova café, a MOT service centre, a row of industrial buildings, and the Nadi centre. Some limited 'activation' of this eastern side of the road might be possible. But along most of the western side of the road there is a fence and a steep drop to railway lines (see aerial photo on page 9 above). East of Old Oak Common Lane the presence of the Elizabeth Line Depot prevents development in the plan period. The Oaklands complex is nearing completion and will not be a 'town centre' set of uses. The remaining section of Old Oak Common Lane (leading to the Atlas Road roundabout) cannot be developed on either side of the road apart from one site on which a housing development proposed in 2017 (Victoria Gardens) did not progress to application stage. To unite Channel Gate/Atlas Road with the OOC station and 'Adjacent Site', as two parts of a 'major town centre' may look faintly plausible on a diagrammatic map. This is what OPDC does in The Spatial Vision Figure Figure/PS2/OPDC/2.2 PSMDLP. But as the Inspector commented at the 2019 EIP hearings, diagrammatic maps can give a false impression of existing topography, physical barriers and existing land uses.	No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre. Town centre uses are already being delivered within the Atlas Junction cluster through the Collective and Oaklands Rise schemes, and will continue to be delivered from other sites as and when they come forward to support delivery of a comprehensive town centre.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	150		Places		P8C1		Referencing 'Union Way' at d) in the PC81 policy box as an all modes access route providing walking and cycling access to the Grand Union Canal towpath is an example of the many elements of the former 'movement networks' that have been lost as compared with the 19.2 Draft Plan. There is already access to the canal towpath at the Collective building on Old Oak Lane (due to be improved by an OPDC In the Making project). Were Union Way to have become an east west link to Scrubs Lane, this would have been a different matter.	No change proposed. Union Way still provides an important connection to the Grand Union Canal and link for pedestrians and cyclist to continue their journey east via a new pedestrian/ cycle bridge connecting across the canal to Hythe Road and on to Scrubs Lane.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	151		Places		P8C1		MM/PS2/OPDC/P8/6 Policy P8C1 g ii) on building heights reads <i>on Oaklands North, generally 6 to 8 storeys facing on to the Grand Union Canal, with generally 10 storeys along Union Way.</i> 'Union Way' as we understand is now due to be a fairly short cul-de-sac at the Oaklands sites?	No change proposed. Union Way still provides an important connection to the Grand Union Canal and link for pedestrians and cyclist to continue their journey east via a new pedestrian/ cycle bridge connecting across the canal to Hythe Road and on to Scrubs Lane.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	152	MM/PS2/OPDC/P9/1	Places		P9		MM/PS2/OPDC/P9/1 This policy and its supporting text at 4.148 to 4.162 (as numbered in the tracked version of the Local Plan) is a complete redraft from the 19.2 version of the Draft Local Plan. See previous comments in Part 1 of our representations questioning whether this extent of modifications, and the preparatory work which went into them (including consultancy costs running into hundreds of thousands of pounds) complies with the legal structure of the PCPA 2004. The schedule of modifications states <i>A full re-write of Policy P9 and supporting text has been undertaken. To review the new policy text, please refer to the Local Plan.</i> Many members of the public, in trying to understand the changes in the Draft Plan between 2018 and 2021, may not look beyond this schedule – especially when the May 17th OPDC consultation letter (delivered to 44,000 households) claimed that <i>much of our draft Local Plan hasn't changed.</i> New proposals for Channel Gate are a very major change, impacting on that part of Old Oak which includes much of the existing residential population.	Noted. See response to previous comments on Part 1 representations.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	153		Places		P9		<p>In justifying its 'refusal' on the 2017 application to designate a large part of Old Oak as a neighbourhood Area, OPDC pointed up the fact that the area of East Acton around Channel Gate/Atlas Road includes a large part of the existing resident population in the OPDC area.</p> <p>In responses to the three previous iterations of the Local Plan, OONF (and the individual residents groups which combined together in 2016 to make up the Forum) supported the regeneration of the sites around the Atlas Road roundabout as a 'neighbourhood hub'. This location, building on the arrival of the 700 unit Collective co-living scheme, was seen as a good location that could be developed to provide the centre of a reinvigorated 'walkable neighbourhood' – once HS2 departs its current construction compounds - with further convenience shops, cafes and amenities such as a GP surgery, optician, day nursery etc. The Old Oak Draft Neighbourhood Plan has been worked up on this basis.9</p> <p>9 This part of Old Oak was designated by OPDC 2017, as a response to an original application for a much larger 280 hectare neighbourhood boundary. The current Old Oak draft neighbourhood plan can be read at http://oldoakneighbourhoodforum.org/?page_id=9. The area includes the Wesley Estate, the Railway Cottages/Old Oak Conservation Area, Atlas Junction, Midland Terrace/Shafesbury Gardens and Wells House.</p>	<p>Noted. OPDC welcome Old Oak Neighbourhood Forum's support for regeneration of sites at Atlas Junction and town centre uses in the area.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	154		Places		P9		<p>In its search for possible new housing sites post 2019, OPDC now sees this 'Place' as <i>a thriving, residential led mixed use neighbourhood that contributes to the delivery of a minimum of 3,100 new homes and 600 new jobs during the plan period</i>. Channel Gate is also portrayed in the PSM DLP as 'part of' (and sometimes the main part of) a major Old Oak town centre.</p> <p>This is an entirely different proposition from a 'neighbourhood hub'. It is one which there has been One session of OPDC consultation in 2021. Two earlier OPDC online presentations in November 2020, covering the totality of the modifications, gave little space for discussion on this location. It is a set of proposals that cannot begin to emerge on the ground until HS2 leave the current construction compounds, some time in the late 2020s.</p> <p>Are these new plans for Channel Gate 'sound', plausible and realistic, for a hitherto neglected part of East Acton surrounded by several small and low rise residential enclaves (Railway Cottages at Old Oak CA, Midland Terrace/Shafesbury Gardens, and Wells House Road)? We are not persuaded this location will provide the receipts from planning obligations that will be needed to deliver the necessary infrastructure, nor that the location make sense in relation to OOC station, as compared with former plans for 'Old Oak Park'. Both Willesden Junction station and the new OOC station are a significant distance in terms of walking times and the attractiveness of the pedestrian route.</p> <p>Driven once again by the seemingly sole concern of meeting housing targets, modified plans for this location come across to local people as a hastily contrived shift of direction by OPDC. At present the location is one large construction site with extreme impacts for residents, given the anticipated duration of the construction of OOC station.</p> <p>The two large sites at Atlas Road and Channel Gate form a large triangle and are divided by the Grand Union Canal. Two of the three sides of the triangle are bounded by impermeable railway lines, leaving Victoria Road/Old Oak Lane as the only entry and exit point to the area. Willesden Junction as the nearest Overground/Underground is 750m from the centre of the Channel Gate site and 950m from the Atlas Road site.</p>	<p>No change proposed.</p> <p>The scale and location of Channel Gate provides a major opportunity to support regeneration of the overall OPDC area.</p> <p>The delivery of mixed use development at Channel Gate has been demonstrated to be viable through the strategic sites viability assessment. It is considered to present a more deliverable option than that previously proposed for Old Oak North, and will lead to a more successful place with less requirements for major infrastructure interventions.</p> <p>The site is a comparable distance from both Willesden Junction and Old Oak Common Station as Old Oak North. As set out in Policy P9, as informed by the Channel Gate Development Framework Principles, development of Channel Gate will be underpinned by a new movement network, and connections to surrounding areas. This will also be supported by major enhancements to Victoria Road, Old Oak Lane and Old Oak Common Lane to provide all modes links to key destinations at Willesden Junction, North Acton and Old Oak Common Station.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	155		Places		P9		As a completely redrafted policy and supporting text, this new section of the PSMDLP document has more internal consistency than many other inadequately 'modified' sections of the document. But it is an entirely new part of a Draft Local Plan on which local residents had no chance to comment at Regulation 18 or 19 stage.	Noted. See response to previous comments on Part 1 representations.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	156		Places		P9		Our detailed objections to Policy P9 relate to: <ul style="list-style-type: none"> • Assigning a location as 'part of a major town centre' gives no reassurance that 'major town centre uses' will in reality wish to locate at Channel Gate. Other nearby locations would offer greater potential in terms of footfall, good public transport access). Ealing Broadway and Harlesden town centre are examples. • North Acton, despite being on the Central Lane has failed to attract uses other than fast food outlets, coffee shops, betting shops, and uses geared to a student and transient population. 	No change proposed. Regeneration of the OPDC area will result in the area becoming a key new destination for people to work, live and play. The Old Oak Major Town Centre will support the new community of circa 20,000 new homes and complement the surrounding network of town centres.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	157		Places		P9		Our detailed objections to Policy P9 relate to: <ul style="list-style-type: none"> • As elsewhere in the PSMDLP, there is a lack of any clear policies on maximum building heights. Policy P9 (o) uses the usual opaque language of this Local Plan. This refers to contributing to a variety of building heights across Channel Gate that respond to sensitive locations and optimise development capacity ... along with tall buildings at appropriate locations throughout Channel Gate in accordance with Policies SP9 and D5. This wording is designed to leave options open the OPDC as the planning authority. We question as above whether this approach will meet 2021 London Plan Policy DP9 on Building Heights. • The lack of any clear policy on housing density ranges as cited previously in these representations. 	No change proposed. Channel Gate is a large site, which the ability to establish its own context. OPDC have defined what areas are appropriate in principle for tall buildings in Channel Gate, while guidance has been provided on appropriate heights adjacent to sensitive locations. Proposals for tall buildings within Channel Gate will be considered in accordance with Policy D5 (Tall Buildings). The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	158		Places		P9		<p>Our detailed objections to Policy P9 relate to:</p> <ul style="list-style-type: none"> The proposal to define a section of Old Oak Lane a 'green street' and to build an extension to the proposed new 'Channel Gate Street' Street' behind the 'railway cottages. This is opposed locally. Such a new road will need to join back into the heavily congested Old Oak Lane at the bridge to Willesden Junction. It would do nothing to relieve or reduce overall traffic flows through the area. While planned as 'car-free' development, the experiences of 2020/21 and longer term trends have taught us that 'car-free' does not mean 'delivery free'. 3,100 new homes would have a major impact on the local road network, already congested. 	<p>No change proposed.</p> <p>The potential future link with Old Oak Lane north of the railway cottages would allow the currently congested Old Oak Lane to be reprovided as a pedestrian and cycle focused street providing only local vehicular access.</p> <p>This proposal is presented only an aspiration. It's deliverability will be assessed through further proposals for the reprovion of Willesden Freight Terminal site and overall movement network for Channel Gate.</p> <p>As set out in Policy T7, proposals will be required to reduce servicing and delivery trips and implement a delivery and servicing plan.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	159		Places		P9		<p>We appreciate that it not the role of an Inspector of a Local Plan to improve the plan beyond ensuring soundness and effectiveness. But for local people in East Acton, the much trailed 'Western Lands strategy' has not emerged as a convincing spatial plan. A £120,000 consultancy project was commissioned by OPDC from master planners Prior+ Partners in late 2019, to make some sense of the 'Western Lands' strategy. Having had to resort to Fol requests to see the 'outputs' of this work, these proved to be nothing more than a set of slide decks used in presentations to landowners and 'stakeholders' (but not to the public). No signs of an imaginative or innovative plan for a thriving, residential led mixed use neighbourhood have emerged from this consultancy exercise.</p> <p>There seems to have been no attempt to create a part of London which might offer something new and distinctive to a younger generation of Londoners looking for a different way to live and work. The coming years of 'London Recovery' strengthen the need for a more radical rethink rather than a repeat of standard BTR tower blocks at this location.</p> <p>In many discussions at the Old Oak Neighbourhood Forum since 2015, we have looked at more innovative approaches to urban planning from across the world. Seestadt Aspern on the edge of Vienna is one example. Almare as a self build/custom build addition to Amsterdam is another. There are European cities which have successfully combined the worlds of work and of home over centuries. In terms of 'London Recovery' and 'hybrid' working between home and office, Old Oak could be a model for some fresh thinking.</p> <p>Fifteen minute 'walkable neighbourhoods' are nothing new. Nor are planning policies which encourage affordable and flexible workspace with policy specifics that in the OPDC Draft Local Plan. We do not understand why OPDC planners retain hard boundaries between SIL and residential areas, and have not explored models of more ambitious 'co-location' as in use in East London.</p> <p>Come the mid 2030s, when the impact of HS2/GWR/Elizabeth Line passenger levels are known, there may be good grounds for further intensification of this part of East Acton. In 2021 those living and working the immediate area see this set of 'modifications' as nothing more than the result of circumstances forced on OPDC in 2019. Unrealistic housing number for this location are being imposed simply because these Opportunity Area targets should have been revisited during preparation of the 2021 London Plan, but were not.</p> <p>In the meantime we have proposed to OPDC the use of the neighbourhood planning framework to come up with a 'contingent' set of site allocations, policies, and a masterplan for Channel Gate/Atlas Road. Such a neighbourhood plan would acquire statutory status only in the event of OPDC's 'Plan A' failing to materialise, for a range of reasons which may arise in these uncertain times. Response at officer has been negative. A designation application to extend the current neighbourhood boundary was submitted to OPDC in May 2021 but awaits the start of publication and statutory consultation.</p>	<p>No change proposed.</p> <p>The Western Lands programme does not form part of the Local Plan's evidence as this work relates to OPDC's delivery functions. Relevant Local Plan supporting studies have been updated and new studies have been produced to support the proposed modifications and respond to the Inspector's Interim Findings.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>OPDC's Statement of Community Involvement (SCI) sets out OPDC's ongoing commitment to support local people in engaging and shaping planning policy documents. The SCI and the Local Plan also set out information for how OPDC will support neighbourhood planning groups in the development of their Neighbourhood Plans.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	160	MM/PS2/OPDC/P10/1	Places		P10	Vision	<p>MM/PS2/OPDC/P10/1 Vision – the updated vision of Scrubs Lane as a <i>characterful and well connected neighbourhood sitting as a hinge between surrounding areas</i> is not seen as a plausible future for this street. The ‘hinge’ concept is not understood. This is a piece of unnecessary (and unknown) planning jargon.</p> <p>Nothing within the 20 year lifetime of the PSMDLP seems likely to change the current basic character of Scrubs Lane. It is a traffic congested north/south artery through a largely industrial area, similar in many respects to Old Oak Lane. It is not ‘well connected’ and has low PTAL levels at the southern end. With no new Hythe Road Overground station, the levels of local access to public transport will improve only marginally even with OOC station (a decade away). Access to this rail interchange from the east will be minimal.</p> <p>Without ‘Old Oak Park’ on the Cargiant land, sales and rental values of new homes at Scrubs Lane will be significantly lower than foreseen in 2018. Revised proposals to ‘optimise’ consents at ‘Mitre Yard’ and North Kensington Gate (South) have already been consented by OPDC. We have only recently discovered that the Mitre Yard scheme has been the subject of a £19m ‘loan facility’ from GLA Land and Property Ltd to the developer City & Docklands, as part of efforts to ‘unlock’ development in Scrubs Lane.</p> <p>Walking distances to OOC station from Scrubs Lane (depending on the exact starting points) will be at or above the 960m outer limit used by TfL for PTAL assessments. The pedestrian cycle route between OOC station and Scrubs Lane will continue to rely on a section of the Grand Union canal footpath, considered by many as an unsafe route. The current pedestrian route from Scrubs Lane/Hythe Road to Willesden Junction may prove possible to improve in some respects, but will always involve a series of level changes to traverse rail tracks.</p>	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The additional contextual analysis was undertaken as part of a plan-led approach to inform the proposed modifications. The modifications continue to deliver the vision for Scrubs Lane demonstrating Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The proposals for Scrubs Lane will see the existing poor quality industrial street evolve into a high quality mixed use neighbourhood that is a place in its own right, with the capacity to deliver 3,500 new homes and tens of thousands of square metres of economic floorspace.</p> <p>Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. These will enable people to reach a range of existing services and town centre uses in Harlesden, Kensal Green and White City.</p> <p>Scrubs Lane itself will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. This will enable access to Harlesden in the north, Kensal Canalside in the east, White City in the South and Old Oak in the west. Improvements in the Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal.</p> <p>A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.</p> <p>These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p> <p>The principle for delivering high quality high density mixed use development in areas outside of SIL continues to be a critical part of the Local Plan and has not been modified as part of the proposed main modifications. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policies SP2 and SP3 provide guidance to deliver Good Growth, improve health and reduce health inequalities. Policies SP2 and SP9 are not proposed to be modified; SP3 is subject to minor proposed modifications.</p>	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	161	MMPS2/OPDC/P10C5/1	Places	P10C5	<p>MM/PS2/OPDC/P10C5/1 The schedule of modifications states includes a barely noticeable statement The new P10C5 cluster policy has been included. To review the new policy text, please refer to the Local Plan. The average resident is not going to alerted by this to the fact that a newly proposed development of high density/high rise housing is being proposed, immediately north of the highly valued open space of Little Wormwood Scrubs.</p>	<p>No change proposed.</p> <p>The Table of Main Modifications sets out the proposed modifications for Scrubs Lane.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, the proposed modifications were initially presented to community members in November 2020 and we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. One of these sessions was focussed on the modifications to Scrubs Lane and focussed, in particular, on the modifications to include a new cluster at Mitre Way. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries 	N
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Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
												answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.		
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	162		Places		P10		Cargiant appear likely to remain as the major occupier of the Hythe Road Industrial Estate for many years To come. Intensification of their landholding, and a new emphasis on the electric car business, seems unlikely to bring major changes to Scrubs Lane itself.	No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to deliver the vision for Scrubs Lane demonstrating Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development. The proposals for Scrubs Lane will see the existing poor quality industrial street evolve into a high quality mixed use neighbourhood that is a place in its own right, delivering a minimum 3,500 new homes and tens of thousands of square metres of economic floorspace. These will complement the industrial uses and ancillary uses that support place making in Old Oak North.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	163	MM/PS2/OPDC/P10/3	Places		P10		MM/PS2/OPDC/P10/3 P10b under Land Uses adds a new sentence b) <i>Delivering a range of 'walk to' town centre uses focussed within the identified five clusters, providing local services for people living and working in the Scrubs Lane Place.</i> How in reality will each separate cluster provide sufficient footfall to support local services?	No change proposed. OPDC considers that given the scale of development envisaged in Scrubs Lane 3,500 homes and space for 1,100 jobs that it is a suitable location for clusters of 'walk to' town centre uses. These clusters will also support employees working in Old Oak North. The proposed modifications also includes elements that provide flexibility for economic land uses outside of SIL to respond to changes in the market.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	164	MM/PS2/OPDC/P10/10	Places		P10	Paragraph 4.163	<p>MM/PS2/OPDC/P10/10 Paragraph 4.163 introduces wholly new material on the significance of Scrubs Lane as a 'place'. If this material was not relevant to the 19.2 Draft Plan there is questionable justification for it to be added now – other than to bolster what is seen locally as an unconvincing attempt to re-position Scrubs Lane as a place in its own right.</p> <p>The 10 minute walking time quoted to reach OOC station is over-optimistic. Road connections through to Kensal Canalside remain as unfunded aspiration. The new sentence <i>Scrubs Lane has the ability to deliver enhanced connections which tie together these surrounding neighbourhoods and deliver a high quality place which makes a significant contribution to local homes and jobs provision in its own right.</i> The street itself has no 'ability to deliver anything, and as yet developers are continuing to display caution in building out schemes consented by OPDC several years ago.</p>	<p>No change proposed.</p> <p>The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The additional contextual analysis was undertaken as part of a plan-led approach to inform the proposed modifications. This includes standard assumptions for walking and cycling times. The modifications continue to deliver the vision for Scrubs Lane demonstrating Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The proposals for Scrubs Lane will see the existing poor quality industrial street evolve into a high quality mixed use neighbourhood that is a place in its own right. It will see 3,500 homes and space for 1,100 jobs being delivered. Developments along Scrubs Lane are underway.</p> <p>Wormwood Scrubs Street is identified in OPDC's Infrastructure Delivery Plan as a project necessary to support development. OPDC considers the delivery and phasing of Wormwood Scrubs Street is justified and effective. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC.</p> <p>OPDC and RBKC have worked closely in the development of OPDC's proposed modifications and RBKC's Kensal Canalside Supplementary Planning Document (SPD). This ensures the delivery and phasing of Wormwood Scrubs Street / South Street is coordinated and deliverable within the plan period. This is confirmed in RBKC's consultation responses. Please see comments 105/2 to 6.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	165	MM/PS2/OPDC/P10/14 MM/PS2/OPDC/P10/15	Places		P10	Paragraphs 4.168 and 4.169	<p>MM/PS2/OPDC/P10/14 Paragraph 4.168 as modified states <i>The clusters will have a key role in sustaining the presence of active uses to support this new community, add life to the street and ultimately support the delivery of Lifetime Neighbourhoods in accordance with Policy SP2. Harlesden Town Centre is not in close proximity to Scrubs Lane.</i> It is 1km distant from the cluster of residential towers granted consent by OPDC just north of Mitre Bridge in 2017/8 (yet to be constructed).</p> <p>Local people are under no illusions as to where this concept of a series of 'clusters' came from. These are the locations where speculative developers purchased sites in the early days of plans for of 'Old Oak Park' as consulted on by Cargiant/London & Regional Properties in 2014/5.</p> <p>At that time, the newly established OPDC encouraged developers to come forward with proposals for these sites, at a stage when a draft Local Plan was at an early stage. The consequence of this approach, coupled with the 2019 'change of direction' has been a series of planning consents which have since fallen below the level investment returns acceptable to the landowners. Prospects for sale or rental of high rise small flats and studios diminished once Old Oak Park and a new Overground station fell off the agenda. Hence a series of applications in the past year to add further housing units, at a time when reduced access to public transport reduced rather than increased the justification for these planning consents.</p> <p>MM/PS2/OPDC/P10/15 Local people who have lived in or near Scrubs Lane for decades also have severe doubts about the 'cluster' concept. Stringing out small pockets of shops and 'active uses' along a stretch of busy main road, from the Harrow Road to Mitre Way, risks an outcome where none of these separated clusters have the critical mass to attract and retain even small convenience stores let alone any wider range of 'active uses' such as <i>shops, cafés, restaurants, community spaces, gyms and local office space cafes</i> (Paragraph 4.169).</p> <p>A single (or even two) housing development(s) at each cluster is not going to provide the necessary customer base. The walking distance between the Harrow Road cluster and the Mitre Way cluster will be 1km. The walking distance to a regenerated Kensal Canalside will be the same. Most studies of 'High Streets' recognise that in an era of declining retail trade, it is the two ends of a parade which should be surrendered to other use classes, in order to leave a viable core. Planning Intentionally to string out a series of 'clusters' seems a strange approach.</p> <p>The St Quintin and Woodlands neighbourhood area lies a few hundred yards to the south of Mitre Bridge. It covers 1,700 households within in a compact set of terraced streets that includes three traditional shopping parades of 6-12 units in each. Despite a 2016 neighbourhood plan which introduced policies to allow flexible change of use class (in advance of national PD rights) vacant units still remain in all three parades.</p>	<p>No change proposed</p> <p>OPDC considers that given the scale of development envisaged in Scrubs Lane 3,500 homes and space for 1,100 jobs that it is a suitable location for clusters of 'walk to' town centre uses that will complement the existing town centre uses in Harlesden town centre. These clusters will also support employees working in Old Oak North.</p> <p>The proposed modifications also includes elements that provide flexibility for economic land uses outside of SIL to respond to changes in the market.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established, plan-led and defined in the Scrubs Lane Development Framework Principles.</p> <p>DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>OPDC recognises the distances noted which strengthens the need and rationale for the delivery of clusters of walk to town centre uses along Scrubs Lane.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	166		Places		P10		This pocket of North Kensington remains a very desirable 'walkable neighbourhood' with wide streets and pavements, primary school, health centre, park and playground, church and good environment. This StQW neighbourhood was laid out in the early years of the 20th century. The StQW Forum would like to see incoming residents of Scrubs Lane provided with a 'place' that even begins to compare in terms of its quality.	No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to deliver the vision for Scrubs Lane demonstrating Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. there area series of other cross cutting policies within the Local Plan which seek to secure high quality public realm, social infrastructure and a good environment, which have been largely unmodified since the submission draft of the Local Plan.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	167	MM/PS2/OPDC/P10/1 PS2/OPDC/PM2	Places		P10	Paragraph 4.171	MM/PS2/OPDC/P10/1 Policy P10 Sub paragraph v) under Public Realm and Movement reads <i>improving existing, safeguarding for and creating new east-west routes at each cluster and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak South, the Grand Union Canal, St. Mary's Cemetery and Kensal Canalside Opportunity Area</i> ; While this sounds like a lot of new east west connectivity the actual changes proposed is the PSMDLP are in fact very limited (as shown by the Map of Key Routes at Figure PS2/OPDC/PM2 in the IDP document). MM/PS2/OPDC/P10/17 Paragraph 4.171 as modified states in similar vein <i>To enhance east-west connectivity new and improved connections are proposed at Laundry Lane, Hythe Road, and along the Grand Union Canal southern towpath and through the delivery of Wormwood Scrubs Street providing improved access to Kensal Canalside Opportunity Area</i> . Improved access to Kensal Canalside from Scrubs Lane is an aspiration. Development within this Opportunity Area in RBKC remains at SPD stage with the single medium-term prospect a redevelopment of the existing large Sainsburys store.	No change proposed. OPDC considers the proposed modifications are sound. The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has worked closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. Scrubs Lane itself will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. This will enable access to Harlesden in the north, Kensal Canalside in the east, White City in the South and Old Oak in the west. Improvements in the Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal. Wormwood Scrubs Street is identified in OPDC's Infrastructure Delivery Plan as a project necessary to support development. OPDC considers the delivery and phasing of Wormwood Scrubs Street is justified and effective. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. OPDC and RBKC have worked closely in the development of OPDC's proposed modifications and RBKC's Kensal Canalside Supplementary Planning Document (SPD). This ensures the delivery and phasing of Wormwood Scrubs Street / South Street is coordinated and deliverable within the plan period. This is confirmed in RBKC's consultation responses. Please see comments 105/2 to 6.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	168	MM/PS2/OPDC/P10/17	Places		P10		MM/PS2/OPDC/P10/17 We see no basis for a modification to add the word 'currently' to the 19.2 wording of this paragraph (which previously read <i>east - west connectivity is poor</i>). Such connectivity will remain poor. Safeguarding a possible new east-west connection at Laundry Lane is an aspiration. The 19.2 version of the Plan included Union Way as an east-west connection which would have made a significant improvement in east-west connectivity. This is a further example of OPDC officers inserting wording which they would like to be justifiable and accurate, when this is not the case. 'Laundry Lane' is described in the updated Development Principles document as a <i>potential connection Into Old Oak North</i> . Limited numbers of people will find this connection a useful addition to the existing Hythe Road entrance/exit at Hythe Road. Neither will provide a through route to East Acton, as Union Way/ Park Road in the 19.2 version would have done.	No change proposed. The proposed modification is justified. Laundry Lane is a potentially important connection to support industrial intensification in Old Oak North and deliver thousands of new jobs. Whether or not this connection is required will depend on the exact form and nature of industrial intensification brought forward.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	169		Places		P10		Hence the whole concept of Scrubs Lane <i>'tying together surrounding neighbourhoods'</i> is currently a distant future hope and not a plausible set of Local Plan proposals in 2021. The updated Development Principles document, and Infrastructure Delivery Plan, which both use diagrammatic maps, raise unrealistic expectations of new connections that are beyond the PSMDLP plan period.	No change proposed. OPDC considers that the proposed modifications are sound. Scrubs Lane will be better served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, a new route connecting Scrubs Lane through to the Kensal Canalside Opportunity Area and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal. A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	170	MM/PS2/OPDC/P10/22	Places		P10	Table 4.2	MM/PS2/OPDC/P10/22 Table 4.2 Building Height Guidance for Scrubs Lane This table has a modified paragraph reading These six locations for tall buildings will support legibility at key east-west intersections with the street, help to meet homes and jobs targets, maintain the character of Scrubs Lane, support the delivery of social infrastructure and open space and manage impacts on the townscape and heritage assets. As pointed out above these 'key east/west' intersections appear only on OPDC diagrammatic maps and not within the February 2021 Figures Modifications and the Policy maps. To use these possible future intersections as a 'legibility' justification for tall buildings is a very weak rationale. The same applies to 'maintaining the character of Scrubs Lane'. Tall buildings are not part of the current character of Scrubs Lane. It is not clear how the arrival of a series of tall buildings will manage impacts on the townscape and heritage aspects. Historic England, RBKC and LBHF all objected to the impact on St Marys Cemetery of the proposed North Kensington Gate (South) tower, increased to 24 storeys with a fresh 2021 planning consent from OPDC's Planning Committee, as granted in January 2021.	No change proposed. The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update. The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established, plan-led and defined in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process. Policies P10C1 to P10C5 provide specific guidance for the location of tall buildings within clusters along Scrubs Lane.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	171	MM/PS2/OPDC/P10C3/11	Places		P10C3	Table 4.2	MM/PS2/OPDC/P10C3/11 A newly added paragraph to Table 4.2 reads <i>The exception to this approach is the Hythe Road cluster where additional tall buildings are considered to be appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road as the existing route into Old Oak North that will be enhanced. We do not consider that this justification of the 'suitability' of this location satisfies the modified 2021 London Plan Policy D9. The real reasons for an extra tower at this location will be to do with site ownership by Cargiant.</i>	<p>No change proposed. The proposed modifications to the Scrubs Lane Policy P10 have been undertaken in response to the Inspector's Interim Findings and are considered to be sound. The modifications continue to demonstrate Scrubs Lane as a well connected place and an appropriate location for housing-led mixed use development.</p> <p>The principle for delivering clusters and coordinating the location of tall buildings in clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses is well established and defined in the Scrubs Lane Development Framework Principles. OPDC considers the proposed modifications to the Hythe Road Cluster policy to deliver two tall buildings within the cluster is justified and sound. The modification for two tall buildings is appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road as the existing route into Old Oak North that will be enhanced. This is set out table 4.2.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	172		Scrubs Lane Development Framework Principles Update				The Scrubs Lane Development Principles Document has been updated. In its previous 2018 version, this document was never progressed to the stage of a SPD and hence never underwent statutory consultation.	<p>No change proposed.</p> <p>The Scrubs Lane Development Framework Principles document was previously subject to the two Regulation 19 consultations. The proposed modifications to the document comprised part of the main modifications consultation.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	173		Places		P10		The unorthodox set of proposals for a series of 'clusters' now extending southwards to a fifth at Mitre Way Off Wood Lane seems to have become established 'policy' in the minds of OPDC planning officers. But it features nowhere in the adopted 2015 OAPF and its introduction continues to be resisted strongly by local people.	<p>No change proposed.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	174	MM/PS2/OPDC/P10C5/1	Places		P10C5		<p>MM/PS2/OPDC/P10C5/1 The PSMDLP includes the North Pole Depot site on the basis that earlier release from DfT/Network Rail has been negotiated, as compared with the 2018 position. The site currently has vehicle access only via a non-public road running alongside the rail tracks from the Kensal Canalside area. The RBKC SPD and masterplan for Kensal Canalside views such a route (termed 'South Street' by RBKC as A 'potential' new route but only in the longer term.</p> <p>MM/PS2/OPDC/P10C5/1 Mitre Way is a purpose-built access road constructed by LBHF in the early 1980s to open up land for the construction of the Mitre Bridge Industrial Estate. While it could be extended into the North Pole Depot site, it is not obviously suitable as road access to a new residential area¹⁰.</p> <p>Mitre Bridge Industrial Estate is a 6,250 sq m purpose built estate of 22 units, dating from the early 1980s. Access to the North Pole Depot site via Mitre Way would involve driving through the estate. It would require any vehicles coming from Scrubs Lane to loop south and then back north for 1km, unless/until a connection can be established from Scrubs Lane. The modifications do not make clear a proposed future for this industrial estate, which is relatively modern and currently well occupied by businesses.</p> <p>10 Mitre Way runs for 500m parallel to the West London Line and the boundary of Little Wormwood, before reaching the northern edge of the industrial estate. It has a single junction with Wood Lane at its southern end, outside the OPDC area. Mitre Way is currently not connected into the North Kensington local roadwork, although may appear so on maps (there is a permanent road closure at the junction with Dalgarno Way).</p>	<p>No change proposed.</p> <p>The Mitre Industrial Estate was proposed for mixed use development in the submission Local Plan and has not been modified as part of the proposed main modifications. The development capacity and phasing for the estate has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>OPDC's Whole Plan Viability Study and Strategic Sites Viability Assessment demonstrate that development is viable across the OPDC area.</p> <p>OPDC's Infrastructure Delivery Plan identifies Mitre Way for enhancements to support access to development. The Mitre Way area will also benefit from a new all modes connection to Scrubs Lane and the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing an all modes connection to Kensal Canalside Opportunity Area and Barlby Road. Longer term, the area will be connected to Old Oak Common Lane and Old Oak Common Station through the western portion of Wormwood Scrubs Street.</p> <p>OPDC and RBKC have worked closely in the development of OPDC's proposed modifications and RBKC's Kensal Canalside Supplementary Planning Document (SPD). This ensures the delivery and phasing of Wormwood Scrubs Street / South Street is coordinated and deliverable within the plan period. This is confirmed in RBKC's consultation responses. Please see comments 105/2 to 6.</p> <p>OPDC's Preliminary Design and Cost Study has considered the necessary vehicular upgrades required to support the Mitre Way area. These have been reflected in the proposed modifications and OPDC's Infrastructure Delivery Plan.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	175	MM/PS2/OPDC/P10C5/1	Places		P10C5		MM/PS2/OPDC/P10C5/1 This new paragraph states <i>The Mitre Way Cluster will be where the existing Scrubs Lane and future Wormwood Scrubs Street meet, providing a key navigation point for these north-south and east-west routes.</i> The western section of Wormwood Scrubs Street remains an aspiration beyond the plan period.	Noted. OPDC's Infrastructure Delivery Plan identifies the western portion of Wormwood Scrubs Street to be delivered beyond the plan period.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	176	MM/PS2/OPDC/P10C5/1	Places		P10C5	Paragraph 4.213	<p>MM/PS2/OPDC/P10C5/1 Paragraph 4.213 states <i>The Mitre Way Cluster boundary is shown in figure xx. Portions of site allocations 40 (North Pole East Depot), 32 (Big Yellow) and 34 (Mitre Industrial Estate) fall within the cluster boundary.</i> There is a Figure No 4.34 P10 Scrubs Lane included in the updated set of Figures. The blue patch labelled as the Mitre Way 'cluster' does not appear to include the Big Yellow Storage site or the Mitre Bridge Industrial Estate. A future image of this area shown at an OPDC presentation to the Board and Planning Committee (see Below) has caused concern to North Kensington residents and regular users of Little Wormwood Scrubs (the open space immediately to the south of the Mitre Bridge Industrial Estate). Inconsistencies between sections of text and figures in the PSMDLP need to be clarified. Plans for this new Mitre Way 'cluster' have not been subject to Regulation and 19 consultation and appear to be untested and too ill-defined at present to be introduced via a modification at the examination stage of a Local Plan document. What happens to the Mitre Bridge Industrial Estate? How is the North Pole Depot site to be accessed by road?</p> <p>NB OPDC image of Scrubs Lane looking south across St Marys Cemetery to proposed development at the 'Mitre Way Cluster' (pale brown) with the Imperial White City campus and 35 storey tower in the background depicted.</p>	<p>No change proposed. OPDC considers that the text and figures set out in the proposed modifications are consistent.</p> <p>In response to the Inspector's queries regarding the Local Plan's figures relationship to an Ordinance Base, OPDC has made amendments to figures and the Policies Map - please see modification reference MM1/PS/Q2Q8Q14. OPDC considers this to be consistent with national policy and legally compliant.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. The North Pole Depot site was identified for development in the submission Local Plan after the plan period. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. These reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>See OPDC's response to comment 117/174 regarding Mitre Industrial Estate and Mitre Way.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	177	MM17/PS/Q3e MINOR/PS/OPDCM17(1)	Design			Principles for securing high quality design	MM17/PS/Q3e MINOR/PS/OPDCM17(1) and (3) Former Policy D1 has been downgraded to a set of 'principles'. Local people lack confidence that OPDC will adhere to them. None of the contentious applications for very tall towers at North Acton, decisions on which OPDC delegated to LB Ealing from the first meeting of the Board in April 2015, have been referred to either the OPDC Place Review Group or to the OPDC Community Review Group.	No change proposed. The proposed modification to amend former Policy D1 to a series of principles for securing high quality design was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan in clarifying the function of policies to guide development. OPDC has a scheme of delegation with the London Borough of Ealing (LBE) whereby planning applications are generally determined by LB Ealing on OPDC's behalf using OPDC's Local Plan, the 2021 London Plan and other material considerations. The recent proposal for 1 Portal Way has been subject to an OPDC Place Review and OPDC Community Review. This approach will continue for future North Acton development proposals.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	178	MM3/PS/Q3f	Design			Principles for securing high quality design	MM3/PS/Q3f The OPDC has operated a Place Review Group since 2015, made up of professionals, to carry out design reviews of major schemes. Initially this process was undertaken by CABE. In 2018 Frame Projects were commissioned to recruit a new panel of assessors and to manage the review process. NB LBE image of developments consented at North Acton January 2021 depicted LB Ealing is a Borough which has not hitherto operated a design review process, although is now in 2021 introducing such arrangements. The OPDC Community Review Group was established in 2019. It is made up of 12 residents/workers from the local community, who have been appointed through an application and interview process. This group is also managed by Frame Projects. The group has so far assessed a number of schemes prior to determination by OPDC Planning Committee.	No change proposed. OPDC has a scheme of delegation with the London Borough of Ealing (LBE) whereby planning applications are generally determined by LB Ealing on OPDC'S behalf using OPDC's Local Plan, the 2021 London Plan and other material considerations.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	179		Design			Paragraph 5.5	<p>Chapter 5 of the PSMDLP has been published with modifications at an awkward time. The process of drafting changes to the text has preceded the series of Government responses to the Building Better, Building Beautiful Commission, the new National Model Design Code and an updated NPPF.</p> <p>Local neighbourhood forums and other community organisations fear that the resultant opportunity lost, for one of the city's last large areas of largely brownfield land, will be a source of regret for decades to come. A new national approach to good design is not reflected in the PSMDLP. This is one of a series of reasons why we argue that the Corporation should make use of the rephased timetable for HS2 (completion 2029-2033) and start afresh with a new Regulation 18 Draft Local Plan.</p> <p>The draft National Model Design Code is not just about the design of individual buildings. It recognises that a combination of the English planning system and the workings of the development industry have failed to create streets and places that are valued by ordinary citizens.</p> <p>Paragraph 5.5 of the PSMDLP does not begin to spell out new requirements to be placed on applicants and developers under the National Model Design Code, and its approach to 'coding' of sites and location.</p>	<p>No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The date for the opening of the Old Oak Common Station is correct and reflects the updated HS2 delivery programme.</p> <p>OPDC considers that the Local Plan is consistent with national policy and guidance. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans.</p> <p>As part of transition arrangements, OPDC's Local Plan is being assessed against the 2012 NPPF.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	180		Character Study				<p>The June 2018 OPDC Character Study does not appear to be being updated as part of the PSMDLP. The document does not cover North Acton and takes no account of development constructed and consented in this key part of the OPDC area. The section on Atlas Road predates the 'Western Lands' strategy. As compared with the level of detailed character studies undertaken by e.g LB Hounslow, this Local Plan and supporting documents will provide no adequate basis of the preparation of design codes for individual parts of the OPDC area.</p>	<p>No change proposed. OPDC's Character Study has not been subject to proposed modifications and continues to be relevant in supporting the Local Plan and proposed modifications. This reflects its role to identify the existing physical character of different areas within the OPDC area to help inform new development. North Acton is included in the Character Study (area B9).</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	181		Design				<p>The revised NPPF (consultation version) includes an additional paragraph (109c) on Considering Development Proposals the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. The PSMDLP will provide only a very limited basis for the OPDC Planning Committee to undertake such consideration on future planning applications.</p> <p>Nor will this PSMDLP support the proposed revised NPPF guidance at 124, Area-based character assessments, codes and masterplans can be helpful tools in helping to ensure that land is used efficiently while also creating beautiful and sustainable places.</p> <p>A significant element of the National Model Design Code is its emphasis on involving local people in genuine engagement in the preparation of design codes and character studies. OPDC's attitude to date towards neighbourhood planning has been defensive¹¹.</p> <p>11 In 2017 the Interim Old Oak Neighbourhood Forum submitted a designation application for a 280 neighbourhood area, extending across the Old Oak part of the OPDC area and including a further set of residential settlements on the edge of the OPDC boundary. This application was refused by the OPDC Board in September 2017 and the current 22 ha area was designated in East Acton.</p>	<p>No change proposed. OPDC considers that the Local Plan is consistent with national policy and guidance. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. At the point of submission OPDC considered the Local Plan to be sound and ready for examination. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans.</p> <p>As part of transition arrangements, OPDC's Local Plan is being assessed against the 2012 NPPF.</p> <p>OPDC's Statement of Community Involvement (SCI) sets out OPDC's ongoing commitment to support local people in engaging and shaping planning policy documents. The SCI and the Local Plan also set out information for how OPDC will support neighbourhood planning groups in the development of their Neighbourhood Plans.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	182	MM4/PS/Q3g D5(c) MM4/PS/Q3g D5(d) M4/PS/Q3g	Design			D4	<p>We do not consider that this policy as modified will satisfy the requirements of the new 2021 London Plan Policy on building heights. Sub paragraphs a) b) and c) are insufficient criteria and measures for assessing an individual site in terms of its 'suitability' for a tall building.</p> <p>This modified draft policy D4 on Tall Buildings gives no indication whatsoever of a range of acceptable building heights in different parts of the OPDC area. It cross refers to Building Heights policies in the Place chapters. These in turn use standardised wording <i>Contributing to a variety of building height...</i> and in many cases include a subsequent 'get out' clause reading <i>tall buildings at appropriate locations throughout (the named Place) in accordance with Policies SP9 and D5;</i></p> <p>By means of this circular combination of plan-wide and 'Place' policies, coupled with occasional specific references to building heights a casual reader of the PSMDLP might reasonably conclude that the OPDC area will not see buildings higher than '8-12 storeys' (an oft quoted range for locations defined in several Place policies). Any mention of buildings of 20-30 storeys or more has been excluded from the Local Plan document. The same applies to the Tall Buildings Strategy with its ambiguous use of the concept of 'shoulder heights' rather than total heights.</p> <p>The PSMDLP appears to rely on its Policy D4 in combination with Place policies and the modified Figure/PS2/OPDC/3.15 showing certain locations for tall buildings (along with 'sensitive edges'. We believe that more specifics on suitability of locations will be needed.</p>	<p>No change proposed. OPDC's Tall Building Statement Update continues to identify a tall building as above 15 storeys or above a minimum of 48 metres above ground level. This is based on methodology set out in the Tall Building Statement Update consistent with the methodology in the submission draft of this study and is not proposed for modification. Figure 3.15 and Place Policies provide guidance for the location of tall buildings.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	183		Design		D5		Policy D5 (renumbered) as modified removes a requirement for Daylight, Sunlight and Microclimate Assessments. The reason give is ' <i>to ensure the effectiveness of the Plan</i> '. In what are destined to become many areas of high rise/density buildings, this requirement becomes ever more important and not less. 2021 London Plan Policy D9 requires assessment of these issues.	No change proposed. The removal of this policy was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan in clarifying the function of policies to guide development.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	184	MM2/PS/Q3i	Design		D6		Policy D6) as modified on Key Views dilutes the wording. The same 'reason' is given . MM2/PS/Q3i	No change proposed. The removal of this policy was required by the Planning Inspector in response to his question Q3e to remove requirements of policies which are related to the process of drawing up a planning application. This ensures the effectiveness of the Local Plan in clarifying the function of policies to guide development.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	185	MM2/PS/Q3j MINOR/ 2/D8/4 a	Design		D7		In the tracked text version Policy D7 on Heritage has been significantly shortened via modification,; MM2/PS/Q3j MINOR/ 2/D8/4 and others. Is this a modification proposed?	No change proposed. This proposed modification was made in response to the Planning Inspector's question Q3j. OPDC and Historic England worked together to develop the proposed modification. Historic England has confirmed its agreement with the proposed modifications in a Statement of Common Ground (OPDC-SOCG-002).	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	186		Transport				This a further critical chapter and set of draft policies in the Local Plan, from the perspective of the public. It is also one where original ambitions for the OPDC area have had to be reduced substantially over the period since 2015.	No change proposed. OPDC considers that any necessary changes to the transport chapter have been made.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	187	MM/PS2/OPDC/T/1	Transport		T1	Paragraph 7.1	MM/PS2/OPDC/T/1 Paragraph 7.1 as modified reads <i>Transport is the catalyst for the regeneration of the OPDC area</i> . As explained above, we think that this assertion is not justified. A rail interchange, even when including HS2, the Elizabeth Line and GWR lines, is no guarantee of a transformational impact on the surrounding area if there are major limitations in terms of proximity and availability of neighbouring development sites.	No change proposed. Old Oak Common station, along with the improvements and investments in walking, cycling and public transport, results in a significant change and improvement in PTAL levels from current levels to future levels - these are shown in Figures 7.10 and Figure 7.11. This improvement in PTAL scores is what makes the area appropriate for high density mixed use development. In addition, there is a significant amount of land identified for development in public sector ownership, which provides more guarantee for development sites to be brought forward.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	188		Transport		T1	Paragraph 7.2	Paragraph 7.2 starts off by saying <i>Transport provision across all modes in Old Oak and Park Royal should be exceptional</i> . It continues <i>Delivering this high quality transport network will enable the attainment of the Mayor's target for 80% of journeys to be made by walking, cycling or public transport</i> . The first sentence has been overtaken by events. The 'movement network' in the OPDC area will not change significantly in the OPDC area, beyond the addition of a HS2/GWR/ Elizabeth Line station. The Old Oak area overall will continue to suffer from historic low permeability for vehicles, cycling and walking.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport across the OPDC area, which includes new stations at Old Oak Common and Old Oak Common Lane, upgrades to existing rail stations, a bus strategy for increasing and extending bus services and new bus routes, new walking and cycling connections and upgrades to existing streets. These transport improvements are reflected in the PTAL scoring, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	189		Transport		T1		The key north south vehicle routes, already congested prior to more development in the area, will remain as before. No new east/west through routes are identified as achievable within the plan period.	No change proposed. Key north/south routes and junctions will be upgraded, as set out in the Infrastructure Delivery Plan. There are a number of new east/ west connections proposed to be delivered within the timeframe of the Local Plan, namely Old Oak Street connecting Old Oak Common Station, Old Oak Common Lane Overground station and North Acton station, and a new pedestrian/ cycle bridge connecting the eastern entrance of Old Oak Common station with Scrubs Lane via the Grand Union Canal.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	190		Transport		T1	Paragraph 7.4	The claim in Paragraph 7.4 that <i>In accordance with Policy SP7, Old Oak and Park Royal's streets should be the exemplar for delivering the Healthy Streets Approach contained in 'Healthy Streets for London'</i> is once again aspiration. Without detailed design codes it is not clear how this aim will be achieved.	No change proposed. Planning policy requirements for delivering healthy streets are set out in the Local Plan and 2021 London Plan and more detailed design guidance will be developed within a supporting Public Realm Supplementary Planning Document.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	191		Transport		T4	Paragraph 7.28	On Paragraph 7.28 as noted above on several occasions, the claim that <i>Old Oak and Park Royal will become one of the most accessible locations in the UK when the proposed public transport investments are delivered</i> can no longer be supported by the modified content of the PSMDLP.	No change proposed. The planned Old Oak Common station continues with its construction and will provide a step change in connectivity, The Infrastructure Delivery Plan sets out significant investments in transport across the OPDC area, which includes new stations at Old Oak Common and Old Oak Common Lane, upgrades to existing rail stations, a bus strategy for increasing and extending bus services and new bus routes, new walking and cycling connections and upgrades to existing streets. These transport improvements are reflected in the PTAL scoring, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	192		Transport		T4	Paragraph 7.35	Paragraph 7.35 is unamended and states <i>It will be important to carefully manage onward journeys from stations to encourage walking, cycling or use of the bus network. There is still likely to be a demand for coaches, taxis and private hire vehicles (PHVs) generated at stations and other land uses such as cultural or leisure uses which needs to be effectively managed.</i> OOC station is now the only new station likely to be built in the life of the Plan. The fact that this will have a sole vehicular entrance at its western end on Old Oak Common Lane needs to be made plain in this paragraph.	No change proposed. Old Oak Common Lane station is still proposed and there are also plans for significant upgrades to Willesden Junction and North Acton stations, amongst others, where provision of taxis, coaches and private hire vehicles would need to be considered.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	193		Transport		T5	Paragraph 7.37	Paragraph 7.37 – same comment as on the previous sections where the ‘potential’ Old Oak Common Lane Overground station is mentioned. This station is not a realistic proposition for this iteration of a Local Plan. This potential infrastructure could be re-inserted at 5 year review stage, if its prospects for delivery improve by then. To include it in 2021 raises expectations that will not be met. The fact that both ‘potential’ Overground stations were shown on maps in the Regulation 18 Draft Plan as if already operational has already sowed confusion. Estate agents and the London property press do not always check their facts carefully before making claims for what they portray as a new ‘regeneration hotspot’. The exaggerated language and unsupported claims used in all three versions of the OPDC Draft Local Plan have encouraged the circulation of such misinformation. A Local Plan should be a succinct and accurate exposition of planning policies, and not an exercise in promoting an area on the basis of false promises.	No change proposed. OPDC and TfL strongly support the delivery of Old Oak Common Lane Overground station and the station has a strong business case for investment. TfL is engaged in discussions with national government, HS2, Network Rail and others in relation to funding the station. The station is therefore a realistic proposition for the Local Plan. It must be included within the Local Plan to ensure that land for its future delivery is appropriately safeguarded.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	194	MM/PS2/OPDC/T5/2	Transport		T5	Paragraph 7.38	MM/PS2/OPDC/T5/2 Paragraph 7.38 has been modified to read <i>The OPDC area will become one of the most connected places in the UK once Old Oak Common station opens.</i> As above, this repeated assertion should not remain in a Local Plan document with no evidence. Much of the OPDC area is miles away from the OOC station site. The area as a whole has a poor road network, many barriers to movement, and limited permeability. ‘Most connected’ as compared with an area of successful master planning and development such as Kings Cross/St Pancras International. We do not think so.	No change proposed. The planned Old Oak Common station continues with its construction and will provide a step change in connectivity, The Infrastructure Delivery Plan sets out significant investments in transport across the OPDC area, which includes a new station at Old Oak Common and a proposed Old Oak Common Lane station, upgrades to existing rail stations, a bus strategy for increasing and extending bus services and new bus routes, new walking and cycling connections and upgrades to existing streets. These transport improvements are reflected in the PTAL scoring, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	195		Transport		T5	Paragraph 7.40	Paragraph 7.40 on OOC station states <i>This should include provision of direct and legible step-free access from the station to appropriately sized and well located walking, cycling, bus, taxi and drop off infrastructure.</i> Again it should be made clear that such provision will not happen at the eastern end of the station.	No change proposed. The Local Plan proposes a walking and cycling access linking to the eastern entrance of the station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	196	MM/PS2/OPDC/T5/3	Transport		T5	Paragraph 7.41	MM/PS2/OPDC/T5/3 Paragraph 7.41 as modified reads <i>New rail stations and rail lines should support Old Oak the OPDC area becoming a major new commercial and high-density residential centre by optimising development opportunities on and/or adjacent to stations and tracks.</i> What stations (in the plural) and new rail lines are being referred to?	No change proposed. The new rail stations are Old Oak Common station and the proposed Old Oak Common Lane station. The new rail lines are Crossrail and HS2 and Greatwest Mainline and the Chiltern Line extension as well as the West London Orbital.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	197		Transport				Many people make decisions to move house on the basis of available public transport connections. Old Oak has been over promoted since 2015 as an area with 'unique' future connectivity. This makes it all the more important the final adopted Local Plan is realistic and fully accurate on matters of road and transport connectivity. Numerous modifications are needed in order to achieve this, and these have not as yet been proposed.	No change proposed. OPDC considers that the modifications are appropriate. The proposals in the Local Plan result in a significant change and improvement in public transport connections - this is shown in Figures 7.10 and Figure 7.11.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	198	MM/PS2/OPDC/H1/1 MM/PS2/OPDC/H1/2	Housing		H1	Paragraph 8.5	<p>Paragraph 8.5 Given the removal of sites at Old Oak North and the challenges of finding alternative housing sites, we again question whether it is accurate and justified for paragraph 8.5 to say The London Plan identifies that the <i>Old Oak and Park Royal Opportunity Areas have the capacity to deliver at least 25,500 homes</i>. To be precise, what is said about the OPDC area in the 2021 London Plan is follows: A Local Plan has been published (not correct, a Draft Plan only) <i>which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners. Positive masterplanning will be used to create an attractive new town centre with distinctive character</i>. This 'attractive new town centre' has in 2021 become hard to pin down in the PSMDLP.</p>	<p>No change proposed. The modifications have been proposed in response to the Planning Inspector's Interim Findings and to ensure general conformity with the Mayor's 2021 London Plan in respect of OPDC's housing targets. The Mayor of London has confirmed in a Statement of Common Ground that the Local Plan is in general conformity with the 2021 London Plan. The Secretary of State for Housing, Communities and Local Government's December 2020 Ministry of Housing and Local Government Ministerial Statement on housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs which if anything, points to an increased need for housing since OPDC submitted its Local Plan. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. The proposed Old Oak Major Town Centre is depicted in figures 2.2, 3.7 and 10.3.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	199		Strategic Policies		SP10		<p>Table 2.1 in the London Plan shows 'indicative capacity for new homes and jobs'. It does not identify that the OPDC area has the capacity.... Paragraph 10.11 in the London Plan states <i>When developing policies for Development Plans, allocations and frameworks, boroughs should use the indicative capacity figures as a starting point, to be tested through the assessment process</i>. Use of the term 'indicative' was a modification required by the Inspectors of the London Plan, in response to evidence from several parties at the EIP that many of the Opportunity Area housing targets were based on slender evidence and are unrealistic. The 2015 London Plan similarly included a 24,000 figures for 'Old Oak Common' on the basis that this would be tested through detailed master planning. We consider that the four iterations of a Draft Local Plan now show that this housing target has been tested to destruction and cannot be achieved in an acceptable and sustainable way, given constraints on funding for necessary transport infrastructure and current site uses that cannot be changed. As a Mayoral body, OPDC has appeared wholly unwilling to question the long term housing targets for the area. The Inspector's initial findings gave a steer towards rephasing of delivery over an extended time period. But we do not consider the PSMDLP to have found a sound and effective way of achieving vent these rephased housing numbers. A more fundamental rethink is needed of what is possible at Old Oak, given the scale of infrastructure investment likely to become available.</p>	<p>No change proposed. Modifications have been made to the Local Plan to describe the 25,500 homes target as "indicative". The London Plan 0-10 year target to deliver 13,670 homes in the OPDC area are not indicative and are minimums. The Local Plan identifies the 19,850 homes capacity for the Local Plan period as a minimum figure of which 13,700 can be delivered in the London Plan 0-10 year period. This capacity has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>OPDC considers the proposed modifications deliver an effective and deliverable Local Plan. OPDC's new and updated supporting studies including the Infrastructure Delivery Plan and Strategic Site Allocations Viability Assessment demonstrate the plan's deliverability. The infrastructure requirements to support the modified sites result in a smaller infrastructure funding gap and consequently, more certainty that sites will be brought forward for development.</p> <p>OPDC'S Infrastructure Delivery Plan (IDP) sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	200		Employment				<p>We share the view expressed by Ealing Councillor Peter Mason at the OPDC Planning Committee (February 23rd 2021) that the PSMDLP and its previous iterations have proved to be surprisingly traditionalist in not exploring the scope for co-location of employment and residential uses. Hard boundaries between SIL and non SIL areas have been retained, with associated policies that are restrictive on change of use. This reduces the effectiveness of the PSMDLP, in our view.</p> <p>Where co-location is referred to within the Draft Plan, it is to co-location of forms of industrial and employment use, not including residential.</p> <p>The Old Oak Neighbourhood Forum has long argued that a 'zone of transition' between the industrial and employment uses in Park Royal, and the existing residential areas in East Acton, are suitable for planning policies which take a flexible approach to 'live/work' and which encourage the use of older industrial buildings in the original streets of Park Royal as mixed workshop and studio use. Provision of relatively affordable (if sometimes 'scruffy') converted former accommodation would (we believe) meet a strong demand amongst self-employed creatives and makers for live/work premises.</p> <p>We appreciate that it is too late to achieve changes rather than 'modifications' in the PSMDLP, but this is a further reason why we call for a rethink and return to Regulation 18 stage.</p>	<p>No change proposed. The 2021 London Plan sets out the strategic approach to promoting and managing industrial land, including defining which uses are appropriate within Strategic Industrial Locations (SIL). In line with the Industrial Land Review, OPDC's key priorities for SIL are to protect, strengthen and intensify industrial activities. The Industrial Land Review and Addendum sets out the rationale for continuing to protect Strategic Industrial Location (SIL) reflecting its success, loss of industrial land across London and the ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum. OPDC's Local Plan does propose the co-location of industrial uses with residential in areas outside of SIL, subject to any impacts being appropriately mitigated and the need to deliver a range of unit sizes as well as affordable workspaces.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	201		Employment		E4		<p>Policy E4 on Work Live Units we see as being unduly prescriptive in its content. Paragraph 9.26 states <i>However, the demand for this type of accommodation has not been established.</i> From what part of the OPDC evidence base this conclusion been drawn?</p>	<p>No change proposed. The policy has been developed to respond to any potential future demand for work/live units and to ensure any issues can be properly considered. It is acknowledged that there is no detailed evidence, or otherwise, to suggest that there is specific demand within the OPDC area at present.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	202	MM/PS2/OPDC/TCC1/1	Town Centre and Community Uses		TCC1		<p>MM/PS2/OPDC/TCC1/1 Policy TCC1 cover Locations for and Impacts of Town Centre uses. We note that OPDC is deleting 19.2 wording which required town centre proposals <i>to be supported by a Town Centre Uses Statement, where they provide over:</i></p> <p><i>i. 5,000sqm of town centre uses in the Old Oak Major Town Centre; or</i></p> <p><i>ii. 2,500sqm of town centre uses elsewhere;</i></p> <p>Given the PSMDLP identification of an elongated/crescent-shaped Old Oak Major Town Centre running from North Acton to Channel Gate, it seems clear that this new 'town centre' is not going to take a conventional form in terms of the distribution and location of town centre uses.</p>	<p>Noted. The requirement for a town centre uses statement has been relocated from policy wording to supporting text on the direction of the Inspector to ensure effectiveness of the plan.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	203	MM/PS2/OPDC/TCC1/3	Town Centre and Community Uses		TCC1	Paragraph 10.4	MM/PS2/OPDC/TCC1/3 Paragraph 10.4 refers to OPDC's town centre hierarchy (also referred to at Policy SP6). It has clearly become increasingly difficult for the authors of the PSMDLP document to re-position parts of the OPDC area into a hierarchy that reflects the London Plan classifications of Metropolitan, Major and District centres. Without a substantive new centre at 'Old Oak Park', this aspect of the PSMDLP now struggles to carry conviction.	No change proposed. As evidenced by the Development Capacity Study (DCS) and Retail Leisure Needs Study (RLNS), the proposed town centre at Old Oak meets in the criteria for a Major Town Centre as set out in the 2021 London Plan.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	204	MM/PS2/OPDC/TCC1/3	Town Centre and Community Uses		TCC1	Paragraph 10.4	MM/PS2/OPDC/TCC1/3 Modified paragraph 10.4 now reads <i>The town centre hierarchy looks to focus town centre uses into four principle locations:</i> <i>a) a new major town centre in Old Oak; and</i> <i>b) two neighbourhood centres at North Acton and Park Royal Centre</i> This sentence is internally inconsistent (one major and two neighbourhood makes three and not four locations). Here North Acton is referred to as a neighbourhood centre. Elsewhere (and at the OPDC Planning Committee) it has been referred to as 'part of the 'crescent shaped' and elongated Old Oak Major Town Centre. These textual contortions in the modifications are already confusing local residents trying to get to grips with the PSMDLP.	Change proposed. This sentence will be modified to reference a total of three principle locations. This is as a result of the inclusion of the previous neighbourhood centre at Atlas Junction within the Old Oak major town centre.	Y	117/204

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	205		Town Centre and Community Uses		TCC1		<p>In the decade or more prior to the opening of OOC station, and in a pandemic period with London shopping streets already seeing multiple vacancies in far more established areas than Old Oak, we cannot see many investors looking at Old Oak as a potential 'town centre location'. We seriously question whether Policy TCC1 is relevant, 'positively prepared' or helpful in a first OPDC Local Plan – due to be reviewed within a few years. The draft policy includes some restrictive elements in relation to SIL and in its requirement for mitigation measures at TCC1(f). From our daily local experience, any new businesses moving into the area, whether it be retail, cafes and restaurants, pubs or places of entertainment, will be fortunate to have the footfall and catchment area for viability. Whether these locations are labelled in the Local Plan as 'clusters' 'neighbourhood centres', or 'major' centres is not going to affect their chances of commercial survival.</p> <p>We believe that the needs of the residential areas within East Acton, and within the boundary of the Old Oak neighbourhood area, would appropriately be served by a neighbourhood centre at Channel Gate/Atlas Road – which might develop more intensive commercial activity over time. The idea that this location should (or could) form one part of an elongated 'major town centre' and will attract a selection of 'major town centre uses' we see as illusory. The physical geography of the area does not support any link with OOC station.</p> <p>Even were a target of 1,200 new homes to be built in the first 10 years of the PSMDLP (which seems unlikely given that HS2 will not be leaving the site before 2026 at the earliest, as we understand) this new population will not support most 'major town centre uses'. There will be other competing locations nearby (and along Elizabeth line) with much better access and a well-established urban environment.</p>	<p>No change proposed.</p> <p>The Old Oak major town centre will be delivered across the entire plan period, in line with the delivery of almost 20,000 new homes, ten of thousands of jobs and supported by major infrastructure improvements, delivering new and enhanced connections across the area. It will be delivered in a series of clusters at different stages, and it will not be until the later part of the plan period that a critical mass of town centre uses will be delivered for it to function as a major town centre.</p> <p>It is not intended that Old Oak major town centre will compete with other town centre locations. It will serve new and existing communities within the OPDC area and surrounding areas, while complementing the surrounding town centre network. It is important that the Local Plan sets and plans for the scale and tone and scale of the centre from the outset of the regeneration of the area in order that the scale of the centre is, on the one hand, sufficient to cater for needs and, on the other, is not of a scale that it adversely competes with neighbouring town centres.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	206	MM/PS2/OPDC/TCC2/3	Town Centre and Community Uses		TCC2		<p>MM/PS2/OPDC/TCC2/3 We take the same view towards Draft Policy TCC2 on 'Vibrancy'. The wording of this policy has major definitional problems. What is '<i>an existing town centre use</i>' or a '<i>town centre use</i>' being newly applied for. The new merged E class will anyway mean that LPAs and development management officers will in future have limited control over uses.</p> <p>The exclusions from the new E class, including pubs and hot food takeaways means that these sui generis uses will still need planning permission for a change to or a from their current use. If sub clauses d) and e) of TCC2 are considered to remain essential, this could be achieved through a slimmed down policy.</p> <p>MM/PS2/OPDC/TCC2/3 We suggest that TCC2 is deleted, on the basis that it is not positively prepared and is more likely to discourage 'vibrancy' than increase it.</p>	<p>No change proposed.</p> <p>It is appropriate to continue to ensure, in so far as a planning powers allow, that proposals contribute to vibrant town centres. Policy TCC2, along with relevant glossary definitions for town centre uses, has been modified to reflect recent changes to the use class order.</p> <p>We strongly disagree that the policy is not positively prepared and is likely to discourage vibrancy. The impact of concentrations of uses such as betting shops and takeaways on health and well-being is well documented and OPDC considers it important to avoid an overconcentration of these uses. Likewise, it is important to secure small units from developments to support SMEs and the growth of new businesses and sectors.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	207	MM/PS2/OPDC/TCC2/3	Town Centre and Community Uses		TCC2		MM/PS2/OPDC/TCC2/3 We note that the whole of former Policy TCC3 has been deleted to reflect the introduction of the new E use class.	Noted.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	208	MM/PS2/OPDC/TCC4/3	Town Centre and Community Uses		TCC4	Paragraph 10.28	MM/PS2/OPDC/TCC4/3 Paragraph 10.28 has been modified to delete a previous requirement for a 9 form secondary school. We heard the reasoning for this change as given by OPDC officers at the February 23rd OPDC Planning Committee. It needs some explanation in the supporting text as it is counter-intuitive for an area planning for 13,000 new housing units in the next 10 years. Readers of the Local Plan will assume that a regenerated Old Oak will need a new secondary school, and that such as school would become an important point of focus for a new community.	No change proposed. The proposed modifications are justified. The updated secondary school requirements within the Local Plan are supported by the Social Infrastructure Needs Study Update. Table 18 of the report confirms that secondary school needs during the Local Plan period remain below the trigger for on-site needs. This is informed by section 4.6 of the report identifies that sufficient capacity will be available in existing secondary schools in Brent and Hammersmith and Fulham to meet demand until late in the plan period, at which point monitoring for on-site secondary school provision will commence. The Social Infrastructure Needs Study Update included input from the three Education Authorities. OPDC is committed to ongoing dialogues with the boroughs to keep under review education requirements in light of the impacts of Covid. This is also set out in the Social Infrastructure Needs Study Update. It is not appropriate or effective for reasons behind this change to be outlined within the main body of the Local Plan.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	209	MINOR/2/TCC7/6	Town Centre and Community Uses		TCC7	Paragraph 10.51	Pubs. Paragraph 10.51 in the tracked version – we are not clear what policy OPDC is operating to at the moment in advance of adoption of a Local Plan? Of the three remaining pubs within the OPDC area, the Castle at North Acton (locally listed) is already due to be demolished to make way for a new development of student housing. Replacement within a new building does not compensate for the lost of a historic pub.	No change proposed. Proposals relating to public houses will be considered in relation to policy TCC6 Public Houses, all other relevant development plan documents and material considerations.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	210	MM/PS2/OPDC/TCC8/1 MM8/PS/Q3y	Town Centre and Community Uses		TCC8		<p>We question the need for this policy. As the supporting text states at 10.58 <i>These facilities would still need to be considered in accordance with other Local Plan policies.</i> What is the merit of this additional policy? It appears to date from a period when the OPDC has aspirations to lure to this part of London a major cultural institution, university or sports facility. At the time of the proposed comprehensive regeneration of Old Oak Park, with a single landowner/developer, such aspirations to follow in the footsteps of Kings Cross, Stratford, and the Olympic Park were plausible. Now they are questionable.</p> <p>Were there a developable site in the immediate area of Old Oak Common station, this aspiration might still be worth highlighting via a Local Plan policy. But unless and until the position changes on the Adjacent Site, it is hard to see any location in the PSMDLP where a potential cultural 'catalyst user' might emerge. The policy and supporting text add to the length of an already wordy Local Plan, to no useful effect.</p>	<p>No change proposed.</p> <p>Old Oak and Park Royal is the largest regeneration opportunity in the UK since the Olympics, with the majority of the core developable land in the area in public ownership. It is appropriate to include policies which plan positively for the impact of proposals for catalyst uses.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	211		Delivery and Implementation		D11		<p>Policy D11 (iv) reads iv. charging CIL on developments in accordance with the CIL Charging Schedules of the Mayor of London and OPDC; Will OPDC have a CIL regime in place by the time of adoption of the PSMDLP? If not this reference causes confusion for applicants.</p>	<p>No change proposed. OPDC will determine its CIL strategy in due course, taking into account the proposed planning reforms.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	212	MINOR/PS2/OPDC/DI/1 MM/PS2/OPDC/DI/2	Delivery and Implementation		D11		<p>MINOR/PS2/OPDC/DI/1 MM/PS2/OPDC/DI/2 The supporting text to Policy D11 runs to several pages and covers a ranges of issues in paragraphs 11.2 to 11.19 which are of limited relevance to the content of this Local Plan (forms of energy investing using ESCOs, tax increment financing, Enterprise Zones and a strange reference to a funding mechanism for Fulham Pools with a mystery 'figure 11.2'. It would have helped for this material, and that explaining the basis of CIL and S106) to have been placed in (e.g.) a Planning Obligations SPD so that the Local Plan could remain more succinct.</p>	<p>No change proposed. The proposed modifications did not amend these elements. OPDC considers the Local Plan is effective.</p> <p>Figure 11.2 is a photo of Fulham Pools.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	213	MINOR/PS2/OPDC/D1/2	Delivery and Implementation		DI1	Paragraph 11.20	MINOR/PS2/OPDC/D1/2 Paragraph 11.20 states <i>Policy SP10 recognises the importance of timely delivery and figure 3.16 provides an overview of OPDC's indicative phasing plan, which is heavily influenced by the planned delivery of the new Old Oak Common station.</i> The final words of this sentence 'in 2026' have been deleted. This modification exposes the extent to which the Regulation 18 and 19 Draft Plans were driven by a HS2 programme which has slipped from 2026 to 2029-33. Proposals and policies drafted for one timeframe are now having to 'modified' to a quite different one. This shows up all too often in a text that needs many further modifications to read as a coherent and consistent document.	No change proposed. The date reflects the updated delivery programme of the Old Oak Common Station.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum	214	MINOR/PS2/OPDC/DI/3	Delivery and Implementation		DI1	Paragraph 11.23	MINOR/PS2/OPDC/DI/3 Paragraph 11.23 (a) reads <i>The HS2 construction sites will be capable of being brought forward for development in a timely fashion around the time of the opening of Old Oak Common station.</i> If this is correct, it contradicts consultation material for Channel Gate which assumed delivery of 1,200 new homes in Years 1-10. The Site Allocation table at 3.1. takes a more cautious view giving 3,100 new homes as a figure spread over the plan period. Which is the correct figure and in which timescale?	No change proposed. Channel Gate has been identified as having capacity for a minimum of 3,100 homes across the Local Plan Period. While the majority of these homes are set to be delivered on the HS2 work sites, there is the potential for earlier delivery of development on privately owned sites which have not been acquired by HS2. For the purposes of the London Plan Period (2019-2029), Channel Gate has been identified as having the potential to deliver 1,200 homes, the majority of which will be delivered on privately owned land not acquired by HS2.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	215	MINOR/PS2/OPDC/DI/3	Delivery and Implementation		DI1		MINOR/PS2/OPDC/DI/3 The modification shown in the Table gives 'after 2029' as a OOC opening date, whereas the tracked text uses 'after 2028'. In all cases we think that the dates used by the National Infrastructure Commission and by HS2 should be used, i.e. 2029-33.	No change proposed. Please refer to the tracked change Local Plan. The date is correct and reflects the updated delivery programme of the Old Oak Common Station.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	216	MM/PS2/OPDC/DI2/4 MINOR/PS2/OPDC/P1/1	Delivery and Implementation		DI2	Table 11.1	MM/PS2/OPDC/DI2/4, MINOR/PS2/OPDC/P1/1 Table 11.1 on Opportunities and Challenges for Development has been modified to include revised numbers of homes and jobs, and with some changes to the text. But further edits are needed, for example: Old Oak South – OOC station is already under construction, a series of S17 applications have already been approved by OPDC, so tenses go astray and some detail is superfluous. The sentence on the Elizabeth Line Depot is from a past era, in reading <i>OPDC is working with TfL and DfT to consider options for its full and/or partial relocation/decking to support development. Any deck structure would artificially raise the ground level of the site and the subsequent challenge of knitting this site into its surroundings (in particular the HS2 station) would need to be addressed through detailed design.</i>	No change proposed. The proposed modifications did not amend this part of the Local Plan. OPDC considers the policies continue to be sound. The wording is still effective and there are no tense errors relating to Old Oak Common station. Likewise, conversations will continue on an ongoing basis for a number of years regarding the potential longer term relocation of the Elizabeth Line Depot.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	217	MM/PS2/OPDC/DI2/3	Delivery and Implementation		DI2	Table 11.1	MM/PS2/OPDC/DI2/4, MINOR/PS2/OPDC/P1/1 Table 11.1 on Opportunities and Challenges for Development has been modified to include revised numbers of homes and jobs, and with some changes to the text. But further edits are needed, for example: MM/PS2/OPDC/DI2/3 Old Oak North – includes unamended wording <i>Other key sites include a triangle of land owned by the London Borough of Hammersmith and Fulham and the European Metal Recycling site. Our understanding is that these are no longer 'key sites' destined for redevelopment via the Local Plan?</i>	No change proposed. These continue to be allocated sites for industrial intensification.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	218	MM/PS2/OPDC/DI2/4 MINOR/PS2/OPDC/P1/1	Delivery and Implementation		DI2	Table 11.1	MM/PS2/OPDC/DI2/4, MINOR/PS2/OPDC/P1/1 Table 11.1 on Opportunities and Challenges for Development has been modified to include revised numbers of homes and jobs, and with some changes to the text. But further edits are needed, for example: North Acton and Acton Wells – refers without qualification to <i>a new Old Oak Common Lane Overground station.</i>	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project. Please refer to response to comments 133/5 to 133/10.	Y	117/218

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	219		Delivery and Implementation		DI2	Table 11.1	MM/PS2/OPDC/DI2/4, MINOR/PS2/OPDC/P1/1 Table 11.1 on Opportunities and Challenges for Development has been modified to include revised numbers of homes and jobs, and with some changes to the text. But further edits are needed, for example: Old Oak Lane and Old Oak Common Lane – refers to Atlas Junction neighbourhood centre when under the confused new 'hierarchy' this is now to be 'part of a major town centre'.	Change proposed. Text has been updated to reflect the proposed updated town centre hierarchy made in response to the Inspector's Interim Findings.	Y	117/219
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	220	MM/PS2/OPDC/DI2/5	Delivery and Implementation		DI2	Table 11.1	MM/PS2/OPDC/DI2/4, MINOR/PS2/OPDC/P1/1 Table 11.1 on Opportunities and Challenges for Development has been modified to include revised numbers of homes and jobs, and with some changes to the text. But further edits are needed, for example: MM/PS2/OPDC/DI2/5 Channel Gate – this land has been acquired by HS2 rather than is being acquired. The after 2028 date is again used for the opening of OOC station, as opposed to 2029-33.	Change proposed. Text has been updated to reflect updated land ownership. No change proposed. The date is correct and reflects the updated delivery programme of the Old Oak Common Station.	Y	117/220
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	221	MM/PS2/OPDC/DI3/4	Delivery and Implementation		DI3	Paragraph 11.28	MM/PS2/OPDC/DI3/4 Paragraph 11.28 Again uses the words <i>Following the opening of Old Oak Common station after 2028</i> .	No change proposed. The date reflects the updated delivery programme of the Old Oak Common Station.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	222		Delivery and Implementation		DI3		Six years into the life of the OPDC there is yet no evidence that the Corporation intends to work to the principles in sub-paragraphs: <i>c) supporting Neighbourhood Forums in the development of Neighbourhood Plans;</i> <i>d) supporting community build, ownership and management programmes;</i>	No change proposed. OPDC's commitment to supporting Neighbourhood Plans is set out in the proposed modifications and OPDC's Statement of Community Involvement.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	223		Delivery and Implementation		DI3	Paragraph 11.31	Paragraph 11.31 states Further details on OPDC's activities in relation to the Duty to Cooperate can be found in OPDC's Duty to Cooperate Statement, a copy of which can be found online. The 2018 version of this Statement does not appear to have been updated as part of the PSMDLP submission documents. Questions of compliance with this duty are covered in a section later in these representations.	No change proposed. OPDC considers it has met the Duty to Cooperate requirement and works closely with its stakeholders including the three Boroughs. The Duty to Cooperate is required to be carried out during the preparation of the Local Plan. The preparation period completes at the point of submission. OPDC submitted its Local Plan in October 2018. Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	224	MM/PS/OPDC M1	Delivery and Implementation		DI3	Paragraph 11.37	<p>MM/PS/OPDC M1 Paragraph 11.37 is a new modification on neighbourhood planning. It reads (as at paragraphs 1.23 and 12.4 of the PSMDLP) <i>Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies. Beyond this, there is extensive scope and flexibility for neighbourhood plans in the OPDC area to bring forward policies and guidance. Examples of what could be covered include development management policy matters, design codes, specific areas and/or neighbourhoods guidance, site specific guidance in particular consideration of how to shape development in accordance with housing targets, and priorities for the use of Neighbourhood Community Infrastructure Levy spending.</i></p> <p>As explained above in comments on Chapter 4 on Places the 2012 NPPF required LPAs to identify strategic and non-strategic policies in their Local Plans. This task, we suggest, cannot be done by a simple assertion that policies in a series of 'Place' chapters are all 'strategic'. Given that such policies apply to the limited geographic area in question, they are surely 'non-strategic' in terms of NPPG criteria unless it can be demonstrated otherwise¹².</p> <p>OPDC's wish to define all Place policies as 'strategic' surfaced in discussions with the OPDC's former Director of Planning in 2017, when the requirement in the neighbourhood planning regime of a 'basic condition' of 'general conformity' was first explained to him. OONF members thought that it was a joke when he turned to his colleagues and said 'then let's make all our policies strategic'.</p> <p>This wording has remained in place through all four versions of the Draft Local Plan and needs to be removed. In its place the PSMDLP should do as the 2012 NPPF required and as a minimum include a schedule of policies identifying those that are 'strategic' and 'non-strategic'. Without such identification, undertaken with due regard to NPPG criteria on 'how is a strategic policy determined' the basic conformity test cannot be applied (by the authors of a draft NP or by an independent examiner) during the preparation and examination of any neighbourhood plan.</p> <p>12 NPPG Paragraph: 076 Reference ID: 41-076-20190509 on How is a strategic policy determined?</p>	<p>No change proposed. OPDC's definition of strategic policies is considered to be consistent with national policy.</p> <p>The proposed modifications did not amend OPDC's definition of strategic policies.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	225		Infrastructure Delivery Plan				<p>As part of the set of PSMDLP documents, OPDC has published a February 2021 IDP. This document demonstrates the lack of certainty over significant funding to support unlocking of key sites and the provision of infrastructure means. Delivery of key elements of the PSMDLP remains very uncertain, thus failing an important test of soundness.</p> <p>Figure 2.1 Development Phasing show how little of the development now envisaged at Old Oak will take place in Years 0-5 and 5-10 of the modified proposals (see map overleaf). This strengthens the case for a fresh start on a Local Plan which is in its PSMDLP form risks proving badly mis-timed in terms of current shifts in Government policy and based on pre-pandemic assumptions on rail travel, 'hybrid' working patterns, and housing design.</p> <p>Paragraph 5.2(d) states The total "unfunded" infrastructure cost is £347 million. This cost will need to be met through planning contributions and other funding sources. A further £250k budget was requested by officers (and approved) at the March 4th 2021 OPDC Board for costs to be incurred in preparing another business case for Government Infrastructure funding. A report to OPDC Board on June 21st 2021 provided an update on how the delivery arm of OPDC intends to proceed in 2021, leading up to the submission to Government of a Statement of Business Case towards the end of the year. Beyond saying that MHCLG is the sponsor department for the government's capital funding for regeneration and housing delivery, it is not clear from which Government funding stream these infrastructure resources will be sought?</p> <p>The letter from Homes England dated 12th February 2021, annexed to the updated OPDC Infrastructure Delivery Plan concludes The Government's National Home Building Fund, announced in November 2020, will be larger and more flexible than the Housing Infrastructure Fund, enabling government to put forward more innovative funding solutions. As and when MHCLG produce a prospectus for this new fund, Homes England will welcome a bid from OPDC.</p> <p>This letter is very far from a firm commitment by Government to any substantive infrastructure funding at Old Oak. 'As and when' is a crucial phrase. OPDC had to withdraw its bid for £250m of HIF funding provisionally awarded by Government in 2018. This was after a 9 month period during which the Corporation had not been open with the London Assembly on the subject of the MHCLG conditions on the funding award. The Corporation's track record of over-promising and under delivering on the availability of infrastructure funding has been documented by the London Assembly Budget and Performance Committee.</p> <p>In relation to the previous HIF bid, FOI requests on the bid content and on its conditions, from the StQW Neighbourhood Forum were rebuffed by OPDC from March 2019 onwards. The documentation was finally published in early 2020 after the Assembly's Budget and Performance Committee had invoked its statutory powers.</p>	<p>No change proposed.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented.</p> <p>Of the 19,850 homes to be delivered within the Local Plan Period, the majority (11,550) are estimated to be delivered within the 0-10 year period. Considering that the planning process for new homes begins many years in advance of on-site delivery, Figure 2.1 emphasises the importance of a comprehensive planning framework to guide development within the period.</p> <p>It is common for a Local Plan to have a funding gap, and it is even more common for there to be a funding gap for a regeneration project as large and complex as Old Oak and Park Royal. OPDC's IDP sets out OPDC's approach to infrastructure funding, which shows that through a combination of planning contributions and government funding, in accordance with the National Infrastructure Commission 2018 National Infrastructure Assessment fiscal parameters for national infrastructure investment, the infrastructure requirements outlined within the Local Plan are fundable.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	226		Infrastructure Delivery Plan				<p>It seems that OPDC now view the National Homebuilding Fund as the potential source of infrastructure funding. While this was indeed announced as a £7.1bn fund, our understanding is that only a small part of this figure will be allocated to infrastructure on brownfield sites,</p> <p>NB Map of phasing of development within the OPDC area (from 2021 OPDC Infrastructure Delivery Plan as submitted to the Planning Inspector March 2021) depicted.</p> <p>The November 2020 Spending Review gave a breakdown as follows: The fund will support up to 660,000 jobs and unlock up to 860,000 homes. This includes funding for:</p> <ul style="list-style-type: none"> • a new 'Help to Build' equity loan scheme for people who want to build their own homes, providing access to low deposit mortgages • £2.2 billion of loans for small and medium enterprises (SMEs) and innovative housebuilders to support new housing in areas where it is needed most • an additional £100 million of grant funding in 2021-22 for unlocking brownfield sites, supporting house building on land that may be less attractive such as ex-industrial sites <p>The March 2021 Budget referred to the Levelling up Fund, the UK Community Renewal Fund and the Community Ownership Fund. Our understanding is that these new programmes will be part of (and drawn from) the £7.1bn and are not 'new money'. The March 2021 Budget publication Build Back Better: our plan for growth makes no further mention of the National Homebuilding Fund. The priorities set out in this document do not suggest that Old Oak would be an area high on the list for Government infrastructure funding (beyond completion of the HS2 station, on which budget increases are already being questioned).</p>	<p>No change proposed. The Infrastructure Delivery Plan (IDP) sets out a range of potential public funding sources which could be utilised to help address the funding gap, of which the National Home Building Fund is just one. OPDC is not relying solely on the NHBF to address the funding gap, however, there is clear government support for potentially using the NHBF to support infrastructure delivery in the OPDC area. Robert Jenrick's ministerial statement on housing needs in December 2020 stated "In order to support London to deliver the right homes in the right places, the government and Homes England are working with the Greater London Authority to boost delivery through the Home Building Fund. Homes England has been providing expertise and experience to support the development of key sites in London. Sites like Old Oak Common, Nine Elms and Inner East London provide opportunities to deliver homes on significant brownfield sites." The letter provided from Homes England appended to the IDP demonstrates the support that there is for the regeneration project and recognises the need for public investment. It notes that Homes England would welcome a bid from OPDC.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	227		Development Capacity Study Update				<p>This supporting document has also been updated. Some of this updating is uncontentious (e.g. where numbers of housing units in developments consented or under construction have been increased via new consents). But the methodology used to identify potential sites, and to allocate to these specific housing numbers, remains contentious. As 1.2 of the document acknowledges, this is a snapshot of capacity at time of writing. Assumptions made on a number of sites appear optimistic, but it is hard for the public to demonstrate this conclusively. Paragraph 1.3 states that the document independently assesses the development capacity of deliverable and developable sites within the OPDC area. There is no sign that this study has been prepared independently of OPDC. Independent analysis is important in a situation where the Corporation is under pressure on its track record as a 'delivery' agency as well as a planning authority.</p> <p>As noted above (Part 1 page 18) the normal Local Plan processes of a 'call for sites' and appraisal of many options thereby generated has not applied in the OPDC area. Only 3 sites emerged from this exercise. Those sites rejected were for very obvious reasons and were never realistic contenders.</p> <p>The development capacity calculations for individual sites have not been based on a clear policy, as there is no such policy on housing densities proposed within the PSMDLP. The housing density range of 300-600 units per hectare, inserted as a modification in supporting text MMPS/OPDC/M4 is of little meaningful relevance to the updated DCS.</p> <p>A list of 'precedent schemes' at 3.10 are cited (with their densities). The appropriateness of these developments, as comparisons with the main concentrations of housing proposed in the PSMDLP (Scrubs Lane, Acton Wells, Channel Gate) is questionable. Planning consents granted to date by the OPDC Planning Committee are also cited as relevant, despite the fact that such decisions have been strongly contested in relation to density (with Borough councillors voting against recent 'optimised' development proposals at the OPDC Planning Committee).</p>	<p>No change proposed. OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and Opportunity Area Development Framework's vision to support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The DCS methodology continues to be justified and accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment. The DCS was produced by OPDC local planning authority officers and assesses each site independently of each other. All housing development sites were either previously identified for development or are proposed to be released from SIL. The justification for the release from SIL is set out in the Industrial Land Review Addendum.</p> <p>The precedents drawn from across London remain relevant. The precedents from the OPDC also remain relevant with a number of these having been implemented.</p> <p>Development capacities of sites are based on the methodology set out in the DCS Update which includes input from other OPDC supporting studies. This has informed the density ranges set out in the DCS Update and the Local Plan.</p> <p>A call for sites consultation was undertaken. The responses to which are set out in DCS Update Appendix C. These were used to inform the outputs of the DCS Update.</p>	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	228	Duty to Co-operate	<p>OPDC prepared and submitted a Duty to Co-operate Statement as part of its submission in October 2018. This statement explained the context as follows: <i>Section 33A of the Localism Act amended the Planning and Compulsory Purchase Act 2004 (2004 Act) by inserting a new legal requirement referred to as the 'Duty to Cooperate'. The Duty to Cooperate (DtC) places a legal duty on local planning authorities, county councils in England and other prescribed bodies to engage constructively, actively and on an ongoing basis to develop development plan documents, including activities that prepare the way or support the activities of preparing development plan documents, in respect of strategic matters.</i></p> <p><i>Paragraph 156 of the National Planning Policy Framework (2012) also outlines strategic priorities that a Local Plan should have strategic policies to cover. They include:</i></p> <ul style="list-style-type: none"> • <i>The homes and jobs needed in the area;</i> • <i>The provision of retail, leisure and other commercial development;</i> • <i>The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat);</i> • <i>The provision of health, security, community and cultural infrastructure and other local facilities; and</i> • <i>Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</i> <p><i>In accordance with the National Planning Policy Framework (paragraph 159), public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out above.</i></p> <p>This OPDC Duty to Co-operate Statement was not updated for the March 5th submission of the PSMDLP. More importantly OPDC has provided no recent evidence that the Duty has been met during the extended period of plan preparation between the Inspector's 2018 Interim Findings and the March 2021 submission. We appreciate that normally the Inspector would satisfy himself/herself that the Duty has been met at an early stage of the Examination. We accept that the 2018 submission and accompanying statement met this legal requirement at the time. We do not accept that the Duty has been met since 2018. Our reasoning is set out below:</p> <ul style="list-style-type: none"> • following the Inspector's Interim Findings in September 2019, OPDC notified the Inspector on 7th November that a response to these findings would be provided in 'early 2020'. A further year then passed before OPDC submitted the PSMDLP documents on 5th March 2021. • OPDC has itself used the term 'preparation' of a Local Plan when referring to the substantive further work that took place during the intervening period, on drafting modifications. • This work had significant implications for neighbouring boroughs (particularly Ealing, Hammersmith & Fulham, and Kensington and Chelsea). The modifications prepared involve a shift of the proposed 'major Old Oak town centre' from one Borough to another, and entirely new proposals for concentrations of high density housing at Channel Gate/Atlas Road and at North Pole Depot/Mitre Way Cluster. • No information or evidence is provided in the March 2021 submission on how these individual LPAs view these new proposals, and whether they are supported or resisted? It is these Boroughs which will inherit the long term consequences of the OPDC Local Plan. • No information or evidence is provided in the March 2021 submission on whether OPDC approached or consulted with adjoining boroughs to discuss whether part or all of the 'lost' 6,500 new homes originally planned for Old Oak North could be accommodated outside the OPDC boundary, so as to lessen pressures to develop sites at housing densities wholly different from their surrounding areas. • LPAs are required to engage '<i>actively and on an ongoing basis</i>' under the Section 33A duty. Other Local Plans have been required to be withdrawn for a failure to meet this requirement (most recently in the case of the Tonbridge and Malling Local Plan13). • The delegation arrangement between OPDC and LB Ealing might be claimed as an example of 'co-operation' between adjoining LPAs. Yet the context for this unusual arrangement, under which one LPA decides very major applications on behalf of another, has never been adequately documented or explained to the public (see Annex A to these representations). Much of the documentary evidence suggests that this delegation resulted (between 2015 and June 2020) in a surrender of discretion by OPDC on making decisions which were properly the responsibility of the Corporation 	<p>No change proposed. OPDC considers it has met the Duty to Cooperate requirement and works closely with its stakeholders including the three Boroughs. It should be noted that the Duty to Cooperate is to cooperate but not necessarily to agree.</p> <p>The Duty to Cooperate is required to be carried out during the preparation of the Local Plan. The preparation period completes at the point of submission. OPDC submitted its Local Plan in October 2018. Paragraph 181 of the 2012 NPPF requires the ongoing cooperation between public bodies on strategic matters. OPDC has continued to cooperate with the relevant public bodies after the point of submission. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, as requested by OPDC's planning inspector.</p> <p>In accordance with the 2012 NPPF 'positively prepared' test of soundness, OPDC's Local Plan is based on a strategy which seeks to meet objectively assessed housing needs, and as well as contributing towards meeting housing need in the London Boroughs of Brent, Ealing and Hammersmith and Fulham and London-wide housing need. The OPDC Development Capacity demonstrates that the housing target can be met within the OPDC area. The Spatial Vision and policies in the Local Plan seek to deliver high quality development and set out a range of considerations that planning applications would be assessed against to ensure this is the case.</p> <p>The delegation of planning applications is a development management function and is not of direct relevance to the soundness of the Local Plan.</p> <p>OPDC's sustainable transport hierarchy, as set out in Policy SP7, is to prioritise walking and cycling as the primary mode of transport, with private vehicles given the least priority. In line with this sustainable transport hierarchy, the Local Plan proposes a new pedestrian/cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station and to Oak Common Lane, providing a new east/ west route from either side of Wormwood Scrubs.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This, therefore, enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>OPDC Planning Committee includes four Councillors from the three Boroughs. OPDC Board includes the three leaders of the Boroughs. OPDC Planning Committee recommended to Board that the proposed modifications be submitted to the Planning Inspector. OPDC Board approved the proposed modifications for submission. LBHF have separately submitted representations as part of the main modifications consultation.</p>	N
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											<p>as the planning statutory authority.</p> <ul style="list-style-type: none"> One of the major failings of the PSMDLP, as compared with the 2018 submission, is the lack of firm and viable proposals for an enhanced road network joining up the existing residential area on the western and eastern sides of Wormwood Scrubs. A second major failing is lack of vehicle access to the eastern end of OOC station. The March 2021 submission provides no evidence of the extent to which these major flaws were explored with LBHF, following the Interim Findings. Were possible solutions discussed with LBHF. Similarly, local people do not understand how and when the newly introduced fifth 'cluster' of high density housing at Mitre Way will connect to the Kensal Canalside Opportunity Area. RBKC has recently consulted on a draft SPD for Kensal Canalside. Will what RBKC call 'South Street' as new east-west route within this Opportunity Area connect with what OPDC call 'Wormwood Scrubs Street East' (Project TV4 (not committed) in the updated OPDC IDP. We appreciate that responses from Boroughs to the current consultation may provide fresh evidence of whether these bodies consider that the Duty of Co-operation has been adequately met since 2018. We would counsel a degree of caution in accepting any officer led representations on this subject that have not been considered or approved by elected members. The voting record of LBHF councillors at OPDC Planning Committee and OPDC Board (not always recorded in OPDC minutes) does not confirm full support for the PSMDLP. <p>Paragraph 5.1 of the OPDC letter of 5th March 2021 to the Planning Inspector states <i>OPDC has held regular meetings with officers from the London Boroughs of Brent, Ealing and Hammersmith and Fulham to share drafts of evidence documents and the proposed modifications to the draft Local Plan.</i> For those living in the area, bland assertions that such meetings have been taking place and have been regular are not enough. The fourth Borough of Kensington and Chelsea is also impacted on significantly. We need to see some evidence which supports this claim.</p> <p>The March 2021 submission material is inadequate in demonstrating that the Duty to Co-operate has been actively pursued and maintained since 2018. This remains one of several reasons, as set out in Part 1 of these OONF/StQW representations, why we consider that the Modified Local Plan should be withdrawn as unsound.</p> <p>13 Inspectors report on Tonbridge and Malling Draft Local Plan June 2021 at https://www.tmbc.gov.uk/downloads/file/1455/ed83-inspectors-final-report-june-2021</p>			
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	229		Tall Buildings Statement Update				<p>The modifications to this 2018 document states that the purpose of this document <i>is to provide information for how OPDC's Local Plan polices (renumbered as D4) (Tall Buildings) and SP9 (Built Environment) are in general conformity the requirements of the London Plan Policy D9.</i></p> <p>Throughout the document the words 'in principle' have been deleted from sentences referring to areas and locations where tall buildings are 'appropriate'. The reasoning for this modification is not clear. It could be taken to imply that the PSMDLP adequately identifies locations for tall buildings and that developers can proceed on this assumption. If so we would strongly disagree with this conclusion.</p>	No change proposed. This proposed modification has been undertaken to reflect wording within 2021 London Plan Policy D9 that has been updated since submission of the Local Plan.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	230		Tall Buildings Statement Update				<p>This supporting document then sets out London Plan Policy D9 at paragraph 1.3. Crucially the modified wording used by OPDC leaves out the addition of the word 'suitable' at sub paragraph 3 of D9(B). It is very hard to accept that this omission is an accidental error. The Secretary of State's intervention in December 2020, to add this key word, was the subject of extensive publicity and debate in the planning press. The accompanying letter from the SOS and Direction Overview DR12 from MHCLG was clear in signalling a shift in Government thinking (as set out below):</p> <p><i>Tall Buildings</i> <i>The draft London Plan includes a policy for tall buildings but this could allow isolated tall buildings outside designated areas for tall buildings and could enable boroughs to define tall buildings as lower than 7 storeys, thus thwarting proposals for gentle density. This Direction is designed to ensure that there is clear policy against tall buildings outside any areas that boroughs determine are appropriate for tall buildings, whilst ensuring that the concept of gentle density is embedded London wide.</i></p> <p>This significant intervention by the Secretary of State, accepted by the Mayor of London, has major implications. In the words of Russell Harris QC <i>the role of the development plan in identifying suitable locations for tall buildings is enhanced. Sites need to be positively identified as suitable</i>¹⁴. London Plan Policy D9(2) states <i>Any such locations and appropriate tall building heights should be identified on maps in Development Plans</i>. We do not see that the PSMDLP documentation, including the Place sections of the modified Local Plan and the Tall Buildings Statements, meet these 2021 London Plan requirements. No process of positive identification of sites is provided, in respects of all elements of London Plan Policy D9.</p> <p>14 Tall Buildings in London – Where Next Landmark Chambers webinar 12th February 2021</p>	<p>No change proposed. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	231	MINOR/PS/Q1b Figure/PS2/OPDC/3.15	Strategic Policies		SP9	Figure 3.15	<p>In terms of the Figure maps, that at MINOR/PS/Q1b Figure/PS2/OPDC/3.15 has been retitled as Sensitive locations and tall building locations. Modified paragraph 1.25 of the PSMDLP states Figures in the Local plan should be treated as indicative. The exact boundaries for spatially specific policies are set out in OPDC's Policies Map. Is this map intended to show 'exact boundaries' for sites for tall buildings? These are shown by an asterisk on a very small-scale map with the key showing these as 'specific locations where tall buildings are an appropriate form of development'.</p>	<p>No change proposed. Proposed modified figure 3.15 provides indicative locations for sensitive locations and tall building locations. Figure 3.15 is based on an Ordinance Base.</p> <p>This relates to proposed modification MM1/PS/Q2Q8Q1 made in response to the Inspector's queries regarding the Local Plan's figures relationship to an Ordinance Base. OPDC considers this to be consistent with national policy and legally compliant.</p> <p>OPDC considers the approach to tall buildings to be in general conformity with the 2021 London Plan and the Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	232		Tall Buildings Statement Update				<p>This PSMDLP documentation demonstrates to us that OPDC planners have not grasped the significance of the Secretary of State's intervention on London Plan Policy D9. The term 'suitable' (missed out in OPDC text) is now defined in the context of all the criteria set out in sub-paragraphs of D9. The term 'appropriate' is no longer valid or meaningful to use, in a London Local Plan.</p> <p>In terms of 'functional impacts' of London Plan D9, it is hard to see that the PSMDLP policies and maps are sufficient to meet the 'suitability test'. This now includes the requirement that <i>it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building</i> (London Plan D9 C2d). Views and heritage impacts are addressed by OPDC in e.g. the updated Scrubs Lane Development Framework Principles document, but this criterion alone does not begin to cover the breadth of 'suitability'.</p>	<p>No change proposed. No change proposed. OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	233		Tall Buildings Statement Update			Paragraphs 2.5 and 2.8	<p>Paragraph 2.5 of the updated Tall Building Statement reads <i>Based on the review, a range of 8 to 12 storeys is considered to be an appropriate height range for the shoulder and/or podium of development at the densities envisaged for the OPDC area. (This density is set out in OPDC's Local Plan and Development Capacity Study). This informs the definition of a tall building for the OPDC area.</i></p> <p>Paragraph 2.8 concludes <i>Therefore, a tall building in the OPDC area is defined as above 15 storeys or above a minimum of 48m above ground level. This is illustrated in figure 1. Above this height, proposals will need to accord with the relevant London Plan and Local Plan tall building policies in addition to all other relevant development plan policies and material considerations.</i></p> <p>This figure of 48m is well above the 30m height figure used by the Mayor and GLA as a threshold for Stage 2 referral, as has operated under the Mayor of London Order 200815</p> <p>Part 3 of the Tall Buildings Statement includes a map showing areas (of significant size) identified as 'appropriate' for tall buildings, along with a number of more specific sites identified by an asterisk. No further information is provided on 'suitability' at each location.</p> <p>No indication is given of proposed building heights in each of these areas or at each location. A series of new areas and locations are added via modifications, on which there has been no consultation at Regulation 18 or 19 stage. Paragraph 3.16 of the Tall Building Strategy states <i>Identifying general maximum heights of tall buildings is not considered to be appropriate at this time.</i></p> <p>In the context of the 2021 London Plan, we consider the way in which the PSMDLP documentation addresses the issues around Tall Buildings and Building Heights to fail to conform with the London Plan, and hence to be unjustified.</p>	<p>No change proposed. The proposed modifications did not amend the definition of a tall building and identification of general maximum heights of tall buildings. OPDC considers the methodology for defining a tall building and resultant definition as evidenced in the Tall Buildings Statement is justified and sound.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	234	General	Scheme of Delegation	<p>ANNEX A OPDC SCHEME OF DELEGATION WITH LB EALING</p> <p>At its first meeting in April 2015, the OPDC Board adopted 'schemes of delegation' with LB Ealing and LB Brent. No such scheme was adopted with LB Hammersmith & Fulham. At that time this Borough was seen as the location for most new development, for which the Corporation wished to retain control.</p> <p>The delegation to Boroughs of decisions on minor applications from individual households has never been contentious. But the scheme with LB Ealing was drawn up to include all applications at North Acton. This has been the subject of questions and challenge from local forums and amenity groups for several years.</p> <p>The basis for these 'schemes of delegation' was negotiated between the then Mayor of London and Borough Leaders in advance of the establishment of the OPDC. The public perception is that the North Acton arrangement was part of a political deal to obtain LB Ealing support for the establishment of a Mayoral Development Corporation in 2015. At an OPDC Board meeting in January 2020, when discussing initial OPDC proposals for a shift of focus to the 'Western Lands' the former Leader of Ealing (Councillor Julian Bell) commented 'well, we will still have our opt-out'.</p> <p>The OPDC Board report in 2015 explained briefly that under delegation arrangements, LB Ealing would continue to decide planning applications at North Acton. The single paragraph gave the reasoning for this unusual scenario as follows:</p> <p>It is proposed that across most of the Mayoral Development Area, the Corporation will determine large scale and other strategically important planning applications itself. The exception is in the North Acton sub-area, where, in recognition of the advanced stage of regeneration, it is proposed that Ealing Council will determine all types of applications on the Corporation's behalf.</p> <p>The consequences of this decision were probably not foreseen by OPDC at the time. Since 2015 new development at North Acton has proved to be critical to the delivery of new housing units within the OPDC area. Based on examination of individual applications and OPDC Monitoring Reports, we believe that LB Ealing has granted consent to the majority (by a small margin) of all the approx 6,000 housing units claimed by the Mayor of London to have been delivered by OPDC 16.</p> <p>During the period 2015-2020 LB Ealing's Planning Committee granted consents to a series of very major developments at North Acton. Analysis of committee reports (undertaken by the StQW Forum (partly to try to understand how S106 receipts were being applied) revealed that LB Ealing officers made only brief reference to the fact that the sites involved lay within the OPDC boundary. Recommendations for consent were based on LBE development plan documents dating from 2012 and 2013, with little or no reference to OPDC 'emerging' policies in the OPDC Regulation 18 and 19 Draft Local Plans.</p> <p>There was little or no documentary evidence of OPDC 'co-operating' with LBE on these applications once these had been referred onwards (at junior level) from OPDC to LB Ealing's planning team. LBE officer reports did not include comments from OPDC. OPDC officers did not attend meetings of the OPDC Planning Committee.</p> <p>Following questions over the basis of this 'scheme of delegation' and suggestions that OPDC was in practice unlawfully surrendering discretion over its decision-making responsibilities, the OPDC Board on June 24th 2020 reviewed the wording of the 2015 version of the schemes¹⁷. The changes made were designed to ensure increased oversight by OPDC of decisions being made on the Corporation's behalf.</p> <p>It subsequently emerged that LB Ealing officers had failed in 2015 to take the necessary report to a Council meeting, to provide any formal approval for the local authority to enter into this 'scheme' with the OPDC. Hence there is some doubt over whether a number of planning consents, issued by LBE on behalf of OPDC on very major developments between 2015 and 2020, were lawfully authorised.</p> <p>We cite this history as an example of why we believe that OPDC has failed to engage actively with LB Ealing in the preparation of development plan documents as required under the Duty to Co-operate. LBE over a five year period was deciding major applications at North Acton, with no evidence that the experience and learning from assessing and determining these applications was being fed back into Local Plan preparation work undertaken by OPDC. Developments built at North Acton over this period are viewed by local people as one of London's least successful examples of concentrated high-density urban renewal.</p> <p>16 The 2020/21 AMR published by OPDC does not give cumulative totals broken down between OPDC and LBE consents https://www.london.gov.uk/sites/default/files/2021_amr_dtp_final.pdf. LB Ealing has failed to publish an AMR since the 2013/14 period. Definitive figures are therefore hard</p>	<p>No change proposed. OPDC considers that it has met the Duty to Cooperate requirement and works closely with its stakeholders including the three Boroughs. It should be noted that the Duty to Cooperate is to cooperate but not necessarily to agree.</p> <p>OPDC Planning Committee includes four Councillors from the three Boroughs. OPDC Board includes the three leaders of the Boroughs. OPDC Planning Committee recommended to Board that the proposed modifications be submitted to the Planning Inspector. OPDC Board approved the proposed modifications for submission. The three host boroughs and RBKC have separately submitted representations as part of the main modifications consultation.</p> <p>The Duty to Cooperate is required to be carried out during the preparation of the Local Plan. The preparation period completes at the point of submission. OPDC submitted its Local Plan in October 2018.</p> <p>OPDC has continued to cooperate with the relevant public bodies in the development of the proposed main modifications. To demonstrate this, OPDC has published a Schedule of Post Submission Engagement alongside the consultation responses, a requested by OPDC's planning inspector.</p>	N
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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	235		General	Consultation			to come by. 17 See CEO report to OPDC Board June 24th 2020			
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	235		General	Consultation			ANNEX B OPDC CONSULTATION LETTER Copy of OPDC consultation letter to 44,000 households as referred to in the section of these representations on Consultation. NB image of OPDC consultation letter depicted	Noted.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	236		Strategic Site Allocations Viability Assessment				ANNEX C STRATEGIC SITE ALLOCATIONS VIABILITY STUDY (SSAVS) 2021 Throughout the past five years of responding to OPDC consultations, the Old Oak Neighbourhood Forum has been able to draw an advice and support from academics who take an interest in major planning issues in London. This final annex to the OONF and StQW Part 2 representations on the OPDC PSMDLP reflects such support, provided on a volunteer basis. The content of this Annex extends beyond the expertise of members of OONF/StQW, but as local residents familiar with the workings of the local property market, the findings and conclusions make sense to us. The 2021 SSAVS is fundamental to the deliverability of the PSMDLP as a whole and to crucial parts. Particularly it is relevant to Strategic Policies SP4 Thriving Communities and SP5 Resilient Economy, all Housing policies, as well as to the Delivery and Implementation Chapter. It is also interconnected with the Development Capacity Study, Industrial Land Review and Infrastructure Plan, all of which have been prepared/ updated to support the PSMDLP.	Noted. Please see responses to detailed comments from OONF/ StQW.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	237		Strategic Site Allocations Viability Assessment				<p>ASSUMPTIONS INPUTTED INTO VIABILITY CALCULATIONS</p> <p>Property Price and Affordable Housing (AF) assumptions: The estimated prices for properties are consistently overestimated. E.g. "4.1.7 In relation to the North Pole East Site in Scrubs lane, based on our research we understand that values of current new build developments in this location (such as Portobello Square) are between £850 and £1,235 with an average of £1,080.</p> <p>Section 4.7 offers extensive detail on developments which are at some distance from the OPDC area, and not located in the poorer income areas, or areas close to industrial estates and railways characterizing much of the OPDC area– Figure 4.7.1. Even achieving the lowest estimated price per property, at £750psf seems out of touch with prices realised in the area: eg currently advertised properties in Scrubs Lane, in the desirable Cumberland Park achieve £550psf; in Shaftesbury Ave £650psf. The one example within the OPDC area (Park Royal – First Central – 5 on p. 14) shows modest prices as: "Sales prices of units sold between 13 February 2019 and 30 September 2020 range from £545 per sq ft to £755 per sq ft with an average of £640 per sq ft." The authors of this study conclude that "4.18 Taking all of the above into consideration, the developments proposed on the Site Allocations would achieve average current sales values of between £750 per sq ft and £850 per sq ft. We consider it very likely that the schemes would achieve values towards the higher end of this range given the delivery of a high quality public realm and finish of the units and facilities offered in the developments, as well as the access to amenities, excellent transport links and integration into established neighbourhoods and wider regeneration areas and facilities."</p>	<p>No change proposed. The Strategic Sites Viability Assessment clearly addressed this issue at para 4.6 setting out that:</p> <p>"... Given the predominantly industrial nature of the area, and the majority of new build schemes currently being built, but not yet available to the market, there is limited new build data within the OPDC area at present. Given this, we have considered evidence from new developments coming forward/delivered in the periphery of the OPDC area to identify the tone of achievable sales values for the area. This is the same approach that was taken to establish the sales values adopted in previous viability studies prepared for the OPDC. In our experience this is a common approach taken to assessing the viability of regeneration areas (such as the London Legacy Development Corporation and the Old Kent Road Opportunity Area), where by their nature there is limited or no new build sales evidence available for the area being assessed. Moreover, the significant redevelopment that is proposed to be delivered would significantly change the appeal and values achievable in the area from that of smaller scale/infill development. "</p> <p>As is often the case with regeneration areas such as the OPDC, that were historically predominantly commercial/industrial in nature and which have or are coming forward as residential led mixed-use development (such as Stratford and wider LLDC area, Nine Elms in Wandsworth, Royal Docks Newham, Meridian Water), at the outset there are no or relatively few new housing developments from which comparable new build sales values data can be drawn. Further, the scale of the regeneration in and of itself and changing nature of the area will support the achievement of higher sales values, more akin to adjacent neighbourhoods. This is why analysis of comparable property price data has covered new housing developments close to OPDC's immediate area. Second hand property prices quoted within OPDC's area Cumberland Park and Shaftesbury Avenue are not directly comparable with large-scale new build housing developments which benefit from a premium. Given the scale of change in the area with new infrastructure and placemaking, and the fact that the strategic sites will deliver over multiple phases from 2023 onwards, officers consider that the study's conclusions on current sales values, and their growth over time, are sound. The approach taken in the viability study is a widely accepted approach to assessing such regeneration areas. It is highlighted for example, that the Old Kent Road CIL Examiner accepted that the values that would be achieved in the opportunity area would be significantly higher than that achieved at the current day of the Examination as a consequence of the envisaged regeneration coming forward and the Bakerloo Line extension. Consequently, values would be more in line with the surrounding neighbourhoods.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	238		Strategic Site Allocations Viability Assessment				<p>We do not find this claim compelling and suggest it is inaccurate, and not based on positive, relevant evidence. We argue that the rest of the SSAVS and the Infrastructure Delivery Plan (OPDC-39-J) does not instill confidence in this outcome: It is clear that achieving these values (which we consider unlikely) rests on being able to secure the highest level of planning obligations from each development, and to achieve the full delivery of transport infrastructure, social infrastructure and public realm. The trade-offs will be between affordable housing and infrastructure/social infrastructure (5.4). In this regard, we direct the Inspector's Attention to the London Plan Policy DF1D in which the Mayor insists that the first call on planning gain income will be for Infrastructure. After Infrastructure and his AH targets have been met, only then are the investments in public realm and social infrastructure to be met. Insofar as the viability of the OPDC plan rests on achieving high values for residential properties as a result of investment in these residual categories of planning gain allocation, which are directly accorded lower priority by the Mayor there should be great cause for concern regarding viability.</p> <p>We also note the intention in the Infrastructure Delivery Plan to alleviate the funding gap for the development by charging owners and tenants for infrastructure via a service charge. This will make second class citizens out of the residents (while others receive these services via general and local taxation). Service charges to owners and residents will also lower value and attractiveness of the offer and raise costs. Affordable housing will attract such service charges too, making them unaffordable. (See IDP, p. 7: "Some service provider costs are often recouped from development either within the initial sales price of properties or through rents/ service charges.")</p>	<p>No change proposed.</p> <p>The Infrastructure Delivery Plan (IDP) sets out a range of potential income from planning contributions, based on S106 contributions secured to date, and potential future CIL charges. Even in the most optimistic scenario, the IDP identifies that a funding gap exists in delivering infrastructure identified as necessary to support the Local Plan. The IDP sets out OPDC's approach to addressing this funding gap, and notes that OPDC is in discussions with Homes England on potential funding opportunities.</p> <p>Policy DI1 of the Local Plan sets out how OPDC will balance priorities for affordable housing and infrastructure delivery. This recognises the to consider the ability of each site to contribute its fair share towards infrastructure (physical and social), affordable housing and sustainability standards, whilst ensuring new development is viable and that the market is appropriately incentivised to deliver.</p> <p>It is not envisaged that service charges would be a common mechanism for funding infrastructure in the IDP. The mention of service charges being used to fund infrastructure is in relation to infrastructure such as utilities, for example, where heat networks are forward funded by an Energy Service Company.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	239		Strategic Site Allocations Viability Assessment				<p>4.19. Assumptions about growth in value over time are at odds with the ongoing HS2 line and station construction works which will adversely affect property values and living conditions for existing and new residents until the station's completion. Even then, the locality will be a series of construction sites whose completion dates can and are expected to continue beyond the proposed plan period.</p>	<p>No change proposed. There are numerous schemes where construction is ongoing around new developments for example, Nine Elms, Greenwich Peninsular, Wembley. We note that the 3% growth identified is an assumption based on average house price inflation, which will impact on all housing delivery i.e.; that in and surrounding the OPDC area and indeed across London and the country. The drivers for this growth are related to wider economic issues such as the availability of finance and housing supply and demand. We consider that these issues will continue to drive house prices as confirmed by the long term historic trends of house price growth. House price forecasts, such as those as evidenced in the viability study, continue to predict upwards house price growth over the next 5 years, and as previously identified it is reasonable to assume continued growth following this short term period. The delivery of the railway line and station have commenced and the purchase of units in the earlier phases and developments in these areas will be seen as a good investment given the new connections and facilities that will be offered when built out. Purchasers often identify locations that are up and coming and purchase units earlier as they know that going forward they will benefit from the significantly improved amenities and that values will also increase so their early investment in the area will save them money and achieve higher equity growth of their property.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	240		Strategic Site Allocations Viability Assessment				<p>4.20 suggests adopting the UK wide assumptions of 3% residential value growth is cautious – but this takes no account of the extremely adverse conditions for much of the duration of the current plan period. These were acknowledged in the previous OPDC Supporting Study (14 (2018) DIFS) which suggested that judicious balancing of early developments to secure an income stream to pay for the development, against the loss of value from early delivery when value is low, needs to be followed. This was when the bulk of delivery would have been some distance from (a) industrial uses and (b) adverse construction impacts. In this context, the value propositions of the SSAVS are overblown, when considered against the OPDC's own analysis.</p> <p>4.22 and 4.23 compound this, by indicating a regeneration uplift – which the Inspector found in his Interim Report to be modestly set at 2%. However, as we are now considering development sites which are adjacent to industrial uses (not moving) and in the centre of huge construction activity, plus with no strong PTAL offer, we invite the Inspector to review his assessment. On these grounds, perhaps the regeneration uplift might be invoked by the end of the current plan period – it should not be considered pertinent to the viability assessments during the plan period.</p>	<p>No change proposed.</p> <p>The study has adopted the residential growth and regeneration premium as considered appropriate by the Inspector in his Interim Findings. Officers remain of the view that in addition to standard residential value growth, the Site Allocations will benefit from the significant and transformational regeneration of the area. This placemaking, enhancement of the public realm, local amenities and the investment into the delivery of infrastructure to be delivered in the wider area, including transport infrastructure, such as HS2 and Crossrail, will lead to a regeneration uplift. The achievement of regeneration premiums or uplifts over and above standard house price growth has been evidenced through research and documented by numerous sources, such as those quoted in the viability evidence, and is widely accepted. The 2018 DIFS Study referred to (Supporting Study 14) was an assessment of infrastructure requirements, now superseded by the 2021 Infrastructure Delivery Plan (Appendix J). In any event the residential sales values assumed in the DIFS (written in 2015) are comparable with the more recent new build sales evidence in the Strategic Sites Viability Assessment.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	241		Strategic Site Allocations Viability Assessment				<p>4.26. We are concerned about the observation regarding off-plan sales, as these are characteristically overseas purchases often with investment or asset security in mind.</p>	<p>No change proposed. The assumption about off-plan sales is a standard assumption in viability assessments and is evidenced in schemes across London. We also note that in many instances securing funding for large schemes relies on a certain percentage of pre-sales of units.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	242		Strategic Site Allocations Viability Assessment				<p>4.32. With 70% Shared Ownership we assume that this goes with 30% London Living Rent (LLR) – but London Affordable Rent (LAR) is the benchmark for affordable housing for the neighbouring wards and boroughs concerned based on objectively assessed housing need as per the OPDC's own earlier work. It is estimated that 50% of Londoners cannot afford LLR. (https://www.london.gov.uk/sites/default/files/ad_132_affordable_and_genuinely_affordable_rents.pdf)</p> <p>In the conclusion the SSAVS observes the potential to achieve a 100% affordable housing development: they comment on the Central Middlesex Site (p. 34 5.5). However, according to the planners' report to the OPDC Planning committee (14 July 2020) this is made up of: "The provision of 158 affordable housing units (100% by habitable room) comprising 24 London Affordable Rent (3-bed) and 134 Intermediate (Shared Ownership) units." As we pointed out in the earlier EiP submissions and hearings, this pattern of very low levels of LAR units is replicated across the OPDC. While an S106 agreement is secured, including public space access and affordable workspaces, contributions to the wider OPDC scheme were not negotiated. The three bed family units are all located in a separate block, with a deck based doorstep play area. However, the main play space is highly compromised by the density and height of the development. It affords, for example, sub-BRE guidance of sunlight – 35% of the area receiving 4 hours of sunlight on 21 March (within the guidelines), and 85% only 2 hours. The planning officers did secure public access in daylight hours to the open space.</p>	<p>No change proposed. The challenges around viability, 50% affordable housing target and meeting objectively assessed housing need were discussed at length at Hearing Session 9 in April 2019. The Local Plan's affordable housing tenure has not been directed to be modified by the Inspector in the examination to date.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	243		Strategic Site Allocations Viability Assessment				4.38 The strategic case for external funding to support affordable housing delivery rests on the overblown assumption that the previous targets can be sustained with the new development.	No change proposed. As set out in Appendix T, the " GLA will work positively with OPDC to negotiate a bespoke funding package to deliver policy compliant genuinely affordable homes at scale". As London's largest opportunity area with the capacity to deliver at least 25,500 new homes and a strategic target to deliver 50% affordable housing, OPDC can make a significant strategic contribution to the delivery of 82,000 affordable homes across London up to 2029 set out in the Mayor's Affordable Homes Programme".	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	244		Strategic Site Allocations Viability Assessment				Overall comment on Residential Viability (Channel Gate and North Pole East Depot) There are significant omissions from this study which make it unsound as a supporting study for the OPDC revised/modified local plan.	No change proposed. The Strategic Site Allocations Assessment provides proportionate, high level viability assessments of the envisaged development for the Strategic Sites in line with the requirements of the NPPF and NPPG. The assessments adopt appropriate standardised costs and values and broad assumptions for a potential development scheme on the tested sites, rather than a more detailed appraisal that would be undertaken for a specific development proposal in support of a fully designed and detailed planning application. This is an appropriate level of detail for viability and plan making.	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	245		Strategic Site Allocations Viability Assessment				The study has not presented detailed information on the contribution to viability of mixed use (as opposed to residential) in Channel Gate and North Pole East Depot.	No change proposed. The Strategic Site Allocations Assessment provides proportionate, high level viability assessments of the envisaged development for the Strategic Sites in line with the requirements of the NPPF and NPPG. The assessments adopt appropriate standardised costs and values and broad assumptions for a potential development scheme on the tested sites, rather than a more detailed appraisal that would be undertaken for a specific development proposal in support of a fully designed and detailed planning application. This is an appropriate level of detail for viability and plan making. The viability assessments include non-residential floorspace in accordance with the site allocations.	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	246		Strategic Site Allocations Viability Assessment				<p>The challenging value propositions of early developments in OPDC (see Supporting Study 14 (2018) the DIFS) is supported by research findings based on developer interviews (See Robinson et al, 2020a; b – links to which are provided at the foot of this paper). A key developer response to this has been to focus on build to rent (BTR) (rather than sale) properties. A MAJOR OMISSION OF THIS STUDY IS TO EXPLAIN THE DIFFERENT VIABILITY IMPLICATIONS OF BTR (see PSMDLP Policy H6 8.51) FOR THE OPDC PLANS. As this was explicitly discussed with BNP and the OPDC in the earlier EiP hearing, there is really no excuse for the omission. We have observed that a large number of the early phase developments have been focused on BTR offers. BTR has been strongly championed by the Mayor, and to be in conformity with the London Plan (and the OPDC Local Plan) should be considered in detail in this study (London Plan Policy H13; OPDC H6). Developers themselves indicate that this is a more feasible proposition during a construction phase in that it does not depend on immediate realization of value (Robinson et al., 2020a; b); it allows partnerships with Housing Associations and with registered providers which generates more potential grant income; and brings forward more housing units more quickly. Details on this should be provided.</p>	<p>No change proposed. The Strategic Site Allocations Assessment provides high level assessments of the envisaged level of development for the Strategic Sites on a for sale basis. OPDC's site allocations policies do not specify the form in which the development of new homes development should come forward on the strategic sites. It is not disputed that the homes could come forward in a number of development forms, including through Build to Rent (BTR). This could also form part of a diversification of the delivery of housing on the sites, i.e.: a strategic site could have early BTR phases and later for sale phases. Nothing in the Local Plan or this assessment precludes this. As has been noted by St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum , a number of sites have already come forward in the area as BTR. These include Oaklands and Mitre Yard which are delivering 40% and 35% affordable housing respectively.</p> <p>We note that there are a number of schemes where BTR/PRS units in part of or the whole scheme have already or are currently coming forward in OPDC's area. These include units at the following schemes: - Oaklands Rise; - First Central - Park Royal 2 - Regency Heights; - One West Point (Portal West Business Centre); and - The Perfume Factory - South - Imperial College - The Clayworks. There have also been recent consents for BTR/PRS residential schemes such as Mitre Yard.</p>	N	
117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	247		Strategic Site Allocations Viability Assessment				<p>The Whole Plan Viability Study for the London Plan provides for private market rental in its assessment of residential development: see Chapter 5, p. 28 (5.4.12, 5.4.13) https://www.london.gov.uk/sites/default/files/london_plan_viability_study_dec_2017.pdf. They were able to provide: "Details of the methodology used to provide a final estimate of investment value of each Build to Rent typology and in each Value Zone and the sources of evidence used are provided in Annex B." They conclude that "Build to Rent can be slightly less viable than for sale although this is supported by the policy requirement for Discounted Market Rent (DMR) rather than low cost rented affordable housing. The Build to Rent case studies can generally support 35% affordable housing with a combination of London Living Rent (LLR) and DMR." (p. 103). The evidence needs to be carefully evaluated, and goes in a number of different directions. The outcome needs to be properly assessed:</p> <ul style="list-style-type: none"> - Build costs remain the same - Tall buildings are not viable for BTR = 26 stories max. This significantly impacts on the viable housing targets during the plan period - BTR requires highly bespoke investments in relation to amenity space, internal and external amenity provision, and high levels of management and maintenance. These are usually imposed by international investors, and have led to difficulties with planning permission and planning gain negotiations in the OPDC Area (delegated to LB of Ealing, e.g. Essential Living at the Perfume factory, North Acton). - There is no financial benefit from higher apartments with views etc, so a different financial calculation is needed and income streams are lower - Developer returns require a different calculation – these may be lower, in favour of a stable income stream but will be resistant to any deviation - Risk varies with the degree of investor commitment versus developer speculation on later on-sale - 	<p>No change proposed. The Strategic Site Allocations Assessment provides high level assessments of the envisaged level of development for the Strategic Sites on a for sale basis. This could come forward in a number of development forms, including through Build to Rent. A strategic site could have early BTR phases and later for sale phases. Nothing in the Local Plan or this assessment precludes this. A detailed viability assessment of a proposed BTR scheme will take into account all of the issues raised here at a planning application stage.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	248		Strategic Site Allocations Viability Assessment				<p>The OPDC Plan (and the SSAVS) is not sound for not considering the basic development principles and viability of this key housing delivery sector as a component of the deliverability of the Plan. It is not consistent with the NPPF. It has not taken account of the area-wide viability assessments for the London Plan, which are based on bands of benchmark land value (see Table J2 from London Plan Whole Plan Viability Study (LPWPVS)). Based on this SSAVS, the benchmark land values could be assumed to fall in Band C (£30,000 – NEPD; £90,000 – CG). However we feel these are an overestimate (see comments following Table J2 below).</p> <p>Annex K p. 59 of the LPWPVS offers a specific evaluation of the viability of BTR in Different Bands of BLV. NB Table J2 London Plan Whole Plan Viability Study depicted London Plan Whole Plan Viability Study (main report), pp. 25-26 defines Band C as market prices of housing for sale = values from £7384-£10083 per sqm. Even if it is accepted at face value the Band C values used in assessing viability of new build in Channel Gate, the following map from the LPWPVS locates OPDC in the lower range of values within the Band D. Given the likely adverse impacts of an area subject to continuing development for more than the 20 year plan period to fulfil the London Plan's strategic targets for Old Oak and Park Royal, it is doubtful that the Band C sales values will be realised.</p> <p>NB image of London Postcode districts showing newbuild sales values in £ per square metre at July 2017 in value bands depicted</p>	<p>No change proposed. The purpose of this report is to test the cumulative impact of the Local Plan's requirements on the Site Allocations including affordable housing, wheelchair accessible units, carbon reduction requirements and OPDC's proposed CIL charges to assess whether the sites are developable. This is in line with the requirements of the NPPF 2012 and the Local Housing Delivery Group guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (June 2012). As noted at paragraph 173 of the NPPF 2012, "the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". The NPPG 2014 identifies at para 005 that: "...should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable". It goes on to state that "Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability. Assessment of samples of sites may be helpful to support evidence and more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies". It does not stipulate different potential forms of development.</p>	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	249	Strategic Site Allocations Viability Assessment	<p>COMMENT ON BENCHMARK LAND VALUES AND INFRASTRUCTURE FUNDING: Benchmark Land Values as per the Three Dragons methodology for the London Plan, and that adopted here by BNP, say nothing more than a technical (and retrospective) look at the conditions of house building, prices etc a few years ago (when data is available). As Pat MacAllister, Professor of Real Estate, Reading University, has noted, (a) the values inputted relate to past experiences, on very different sites, not those under consideration for development – as in the case of the SSAVS, these sites are unrealistically high value sites in well known and settled neighbourhoods. In the SSAVS future uncertainties are considerably downplayed against overoptimistic scenarios of value uplift; and (b) the realization of the residual value by the planning authorities depends on the implementation of the policy criteria whereby land price is not inflated by expectation pricing (of future development), and rests on planner-developer negotiations which are very unpredictable. (See https://getrealpat.wordpress.com/2019/05/16/benchmark-land-value-a-missed-opportunity/). This is especially the case when the OPDC is relying not on CIL but on unpredictable S106 negotiations.</p> <p>As the LPWPVS notes, while there may be pockets of high value opportunity in certain areas with new infrastructure (such as Opportunity Areas), abnormal costs can push low value sites quickly into unviability – 14.2.6. As with most Opportunity Areas, or hard to develop brown-field sites, the challenges of developing the OPDC site across different levels and in relation to an existing highly overcrowded transport system remain.</p> <p>The Infrastructure Delivery Plan (IDP) has adopted some worrying strategies to minimise the unfunded infrastructure costs. A number of projects are designated as “desirable” – we have contested this description of crucial contributions to transport and social infrastructure, place-making and accessibility. A number of social infrastructure projects are to be paid for by “planning contributions”; another category is “developer cost” (these will both be factored into S106 contributions in the case of the OPDC which has no CIL). For Developer Cost, for example, is a Sports and Leisure Centre (SI16), which is a category listed in the 2016 draft CIL Reg123 List. These allocations are unclear and confusing. Our view is that this IDP offers no sound basis or evidence that the development can viably proceed, especially when read against the marginal viability of the key development sites in the upcoming plan period. We note that the absolute values of RLV calculated by BNP in this SSAVS (which we think are optimistic) indicate that at most levels of delivering affordable housing, the income streams available for planning gain recovery are relatively low, compared to the significant infrastructure needs. We direct your attention to the absolute income streams likely to be delivered – at 25% AH, and a more realistic assessment of £750psf, the income streams might be as little as £1,853,646 (£855,454 at 30% with grant) to deliver all the additional infrastructure and planning obligations required beyond the minimal list in the draft CIL.</p> <p>NB images of Assessment Figure 5.9.1 and Viability Analysis depicted</p> <p>Abnormal costs might be added to the scenarios of the OPDC following the LPWPVS at e.g. £183 per square metre. How does this affect viability? (LPWPVS, 5.6.13). The prognosis for Band C Residential 12 type (build to rent Res 12 - 750 dwellings for rent over 15 storeys at 450 dph) with higher costs considered, is not very promising, indicating a lot of net negative residual value. (See table below from p. 80 of the LPWPVS p. 80).</p> <p>NB image of case study matrix depicted</p> <p>The absolute numbers of income streams likely from the key development sites is quite out of kilter with the anticipated funding streams from CIL/S106, and the extent of the unfunded costs of the development, as presented in the IDP, p. 60:</p> <p>NB image of Table 5.1 Overview of Infrastructure Costs depicted</p> <p>The summary of anticipated income streams from planning gain represented in the IDP, p. 8, do not cite the SSAVS, and do not reflect the significantly reduced residual income streams anticipated based on these new viability assessments of the key sites. No evidence is provided for the numbers generated there. The data is based on the 2016 draft CIL and is out of date. This supporting document (IDP, Feb 2021) is not</p>	<p>No change proposed. In line with the best practice requirements of the NPPG, the viability assessment has taken into consideration the existing use values plus a premium of the strategic sites assessed.</p> <p>At this early stage, assessments to establish if abnormal costs exist and if so to what extent has not been undertaken and therefore it is difficult to appropriately allow for these in high level viability assessments. Further, in BNPPRE's experience of assessing site specific viability for two adjacent sites' planning applications, where such studies had been undertaken and consequently the abnormal costs known, one was identified as having significant abnormal costs whilst the other incurred no abnormal costs at all. To assess one site based on the other site's information would have been completely incorrect. We note that the September 2019 NPPG states that the implications of abnormal costs should be reflected in benchmark land values. The projected income from planning contributions set out in the Infrastructure Delivery Plan is intended to set an indicative range of potential future income from planning contributions. When measured against the overall infrastructure cost, this has allowed OPDC to identify the potential funding gap.</p> <p>The lowest of the potential funding streams is based on confirmed contributions secured through S106 agreements secured to January 2021, and is an accurate reflection of what has been secured to date. These rates do not include the value of strategic infrastructure projects secured as in-kind obligations. The 2016 Draft CIL Charging Schedule is the best available and most recent evidence available on potential future CIL income in the OPDC area across the entire plan period.</p> <p>While updated evidence may result in a different set of charging rates, land and sales values will continue to change across the plan period, as will the mechanisms for how developer contributions are secured. As regeneration of the area progresses and new communities are established, it is likely that this will result in improved viability and potential for higher levels of planning contributions than at present.</p>	N
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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	250		Strategic Site Allocations Viability Assessment				<p>sound, it is not based on positive up to date evidence – it does not even use the available evidence provided by other supporting studies developed for this PSMDLP.</p> <p>Infrastructure cost assessments in the Viability Study: - Mayoral CIL2 charges have been considered - Infrastructure costs have been allocated based on the 2016 Draft CIL from OPDC which covered only the following infrastructure “We have allowed for OPDC’s proposed CIL charges (2016) in our appraisals, as set out in Table 4.55.1 below.” Regulation 123 List (from 2016 OPDC Draft CIL) is not an exhaustive allocation of the basic infrastructure requirements of the development and is out of date.</p> <p>NB image of Table 4: Regulation 123 List depicted</p> <p>It is noted that “4.58 No further financial contributions towards infrastructure have been allowed for in the appraisals. This is on the basis that development specific Section 106 contributions will be sought on a case by case basis and their impact on viability will need to be considered alongside affordable housing provision at the development management stage.” This raises the question as to whether the Viability Appraisal which follows, then leaves sufficient scope to deliver affordable housing to the Mayor’s requirements as well as the meeting the required levels of infrastructure provision on which the draft CIL list is not exhaustive and is outdated.</p> <p>The conclusion of the BNP appraisers seems to be that it will not (p. 34 6.4). They offer the consolation that housing of all types is required and assert that the OPDC will deliver on the Mayor’s objectives even if it realizes only the 5% affordable housing envisaged in some of the scenarios. It barely goes without saying that such delivery scenarios would not be in conformity with the London Plan and the objectives of the PSMDLP. Our conclusion, based on the comments we have made here above, is that the Plan has not been supported with an adequate evidence base and that it is not viable and deliverable. Therefore, it is not effective, consistent with national policy and guidance, and not in general conformity with the London Plan, and is not sound. i Note: Additional supporting material, namely two major academic papers and one shorter paper which address the financial issues around developing and planning the OPDC area can be found here: https://drive.google.com/drive/folders/1nJvgA_TpWyn--JxKd7J-81SdJE7AMREf?usp=sharing</p>	<p>No change proposed. The results of this assessment demonstrate that all four of the Strategic Site allocations tested are “developable” in terms defined by the NPPF 2012. Policy H2 sets a strategic target of 50% affordable housing, subject to viability, and the application of the Mayor of London’s threshold approach to viability. Officers consider that the results of the appraisals do not indicate that the 50% affordable housing target and threshold approach should be amended. Setting any percentage below the current strategic target of 50% would, in principle, mean that some schemes that could have delivered more than 35% up to and in some cases beyond 50% would no longer be required to do so. The latest Annual Monitoring Report (AMR) (2020/21) demonstrates that sites currently under construction in the area are achieving 39% affordable housing (by habitable room). This demonstrates that the threshold approach is working and OPDC’s policy is in general conformity with the 2021 London Plan, as confirmed in the Mayor of London’s Statement of Common Ground.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	251		Places		P10C5		<p>Note: Unbold text = OPDC response to previous query; Bold text = StQW Neighbourhood Forum response</p> <p>Connections</p> <p>Wormwood Scrubs Street east of Scrubs Lane within the proposed modifications to the Local Plan and OPDC's updated Infrastructure Delivery Plan (IDP) is identified as a necessary piece of infrastructure (please see project ID TV4) and not a potential piece of infrastructure. The IDP identifies this to come forward in years 0-10 of the plan. This is based on discussions with the Department for Transport as the landowner of the North Pole East site and demonstrated in the Statement of Common Ground between OPDC and DfT.</p> <p>As you will know from our Part 2 representations, several of us local residents have managed to read the IDP. Identifying a piece of major infrastructure as 'necessary' while also 'unfunded' can reasonably be defined as 'potential', especially in this first iteration of an OPDC Local Plan.</p> <p>We will wait to see how RBKC view the timing of a 'South Street' and a connection to a 'Wormwood Scrubs Street East' in a final version of the this council's SPD for Kensal. We have been responding to consultations on this Opportunity Area for the last decade and little has happened on the ground - so please forgive our doubts on claims made in Local Plan material. As we have said in our recent representations to OPDC and the Inspector, we wish any adopted OPDC Local Plan to avoid over promising on new roads and connections that may or may not happen in the initial 5 years of a Local Plan. Otherwise the public lose faith that planning documents mean what they say.</p> <p>The draft Royal Borough of Kensington and Chelsea (RBKC) Kensal Canalside Supplementary Planning Document (SPD) identifies that the portion of the North Pole Depot within RBKC (section D within the SPD) will likely come forward later. As we have pointed out. Even Years 6-10 may be optimistic? As we understand the 'plan period' for the OPDC Local Plan remains 2018-2028 and does not start from 2021, so we are already in 'Year 3'?) We understand from RBKC officers that this will likely be within years 6 to 10 of RBKC's Local Plan period (currently 2019 to 2029? The adopted version does not seem to give a plan period?) and that this will be clarified in modifications to the Kensal Canalside SPD. This aligns with phasing information set out in OPDC's documents.</p> <p>Therefore, the phasing and delivery of South Street within section D within RBKC, that will connect with Wormwood Scrubs Street within the OPDC area will be coordinated across both local planning authorities, providing the vehicular connection to Barby Road. This is reflected in OPDC's Bus Strategy Update. All very well to reflect proposals in a Bus Strategy, but this does not give any assurance that this new east/west route will happen before the late 2020s. The western part of Wormwood Scrubs Street is acknowledged as being +20 years away.</p>	<p>No change proposed. Wormwood Scrubs Street is identified in OPDC's Infrastructure Delivery Plan as a project necessary to support development. OPDC considers the delivery and phasing of Wormwood Scrubs Street is justified and effective. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC.</p> <p>OPDC and RBKC have worked closely in the development of OPDC's proposed modifications and RBKC's Kensal Canalside Supplementary Planning Document (SPD). This ensures the delivery and phasing of Wormwood Scrubs Street / South Street is coordinated and deliverable within the plan period. This is confirmed in RBKC's consultation responses. Please see comments 105/2 to 6.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	252		Places		P10C5		<p>Note: Unbold text = OPDC response to previous query; Bold text = StQW Neighbourhood Forum response</p> <p>Vehicular access to the Mitre Way cluster and surrounding area is proposed via three streets:</p> <ul style="list-style-type: none"> • Scrubs Lane • Mitre Way • Wormwood Scrubs Street (identified as South Street in RBKC) <p>Please see the IDP for further information regarding projects TV3 and TV4. We have looked at the IDP and the information and maps on these projects. But we would still like to see how these three vehicle access routes are achieved, taking account of the West London Line embankment and the significant level change at the approach to Mitre Bridge. Can a larger scale map be provided? A new walking and cycling connection is also proposed from Scrubs Lane. Please see the IDP for further information regarding project TP3. These connections will ensure the Mitre Way cluster and surrounds will be well connected to public transport and active travel networks supporting the new neighbourhood. Sorry if we remain unconvinced on this last sentence, but we do know well the existing road layout and topography of the area.</p> <p>OPDC's IDP sets out the infrastructure required to provide appropriate access to the North Pole East Depot. These requirements would be valid if the Mitre Industrial Estate came forward for development before, during or after the development of the North Pole East Depot. Given the role of figure 4.3 in the IDP, the gap in the arrows within the IDP between TV4 and TV10 should not be read as an intended gap between the sections of Wormwood Scrubs Street proposed to be delivered. Not clear what this reply means, but this would become clear if we can see a larger scale map of how these connections are planned to be achieved?</p>	<p>No change proposed. The Preliminary Infrastructure Design and Costing Study (PIDCS) demonstrates how these infrastructure projects are effective and justified. This information is appropriately detailed to support the role of the Local Plan.</p>	N	

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117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	253		Places		P10C5		<p>Note: Unbold text = OPDC response to previous query; Bold text = StQW Neighbourhood Forum response</p> <p>Mitre Industrial Estate</p> <p>The development of the Mitre Industrial Estate for mixed-use development has been identified within previous drafts of the Local Plan including the submission version of the Local Plan. Redevelopment of the Mitre Industrial Estate is based on evidence base set out in the Scrubs Lane Development Framework Principles (SLDFP). We are not proposing modifications relating to the Mitre Industrial Estate. The site continues to be identified for a minimum of 200 homes and space for 60 jobs.</p> <p>OPDC is not proposing to purchase the Mitre Industrial Estate. To facilitate the delivery of the Mitre Industrial Estate and support comprehensive development of the wider area, OPDC will work with stakeholders in accordance with Local Plan policy DI2.</p> <p>The identification of the site for development within the Development Capacity Study (DCS), and the definition of the phasing as 'developable' within 6 to 10 years of the plan period meets the requirements for Local Plan development sites set out in the National Planning Policy Framework (2012) and National Planning Practice Guidance Housing and Economic Land Availability Assessments.</p> <p>All the above may be true, but does not answer our question on what are the OPDC's plans and proposals for the future of this existing (and relatively modern) industrial estate. If you look back you will see that we were asking this question back at Regulation 18 stage in 2017. Identifying a future use for a site in a Plan is one thing, and ensuring this this comes about is another (as we do not have to tell you). If OPDC is not intending to acquire this land from its owners (Merseyside Pension Fund and Wirrall DC) the industrial estate will presumably carry on as is? When I have talked to those in the units on the estate, they say they know nothing about plans for this estate to become high density housing.</p> <p>If the estate stays as is, then a vehicle route to the North Pole Depot east site would be through an industrial estate (extending Mitre Way or connecting from Scrubs Lane?) Hardly a selling feature for one or more new housing developments at North Pole East.</p>	<p>No change proposed.</p> <p>The Mitre Industrial Estate was proposed for mixed use development in the submission Local Plan and has not been proposed to be modified. The development capacity and phasing for the estate has been defined by a design-led and plan-led process evidenced in supporting studies. The Development Capacity Study Update includes this information and sets out a clear methodology for how development capacity and phasing has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>OPDC's Infrastructure Delivery Plan identifies Mitre Way for enhancements to support access to development. Further information is set out in the Preliminary Design and Cost Study. The Mitre Way area will also benefit from a new all modes connection to Scrubs Lane and the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing an all modes connection to Kensal Canalside Opportunity Area and Barlby Road. Longer term, the area will be connected to Old Oak Common Lane and Old Oak Common Station through the western portion of Wormwood Scrubs Street.</p>	N	

117	Community / interest group	Henry	Peterson	St Quintins Neighbourhood Forum and Old Oak Neighbourhood Forum	254	Places	P10C5	<p>Note: Unbold text = OPDC response to previous query; Bold text = StQW Neighbourhood Forum response</p> <p>SLDFP diagram</p> <p>Regarding clarity of the SLDFP diagram, please see the other SLDFP diagrams relating to building heights, the Mitre Way Cluster and the Scrubs Lane Strategic View Assessment modelling appended to the SLDFP.</p> <p>It is the 'view assessment modelling' and some of the diagrams in the modified Scrubs Lane Development Principles document which have caused the concerns set out in the OONF/StQW representations on the PSMDLP (and in those from LBHF). The Mitre Way Cluster has been added during the Examination stage. The connection from Scrubs Lane is shown in most of the new diagrams as a definite 'all modes route' in a solid black line. In the SLDFP document on page 44 (should be 45) it is a broken line and described as 'longer term potential all modes route'. Which is a more accurate description?</p> <p>The views assessment and the conclusion that the impact on Wormwood Scrubs and Little Scrubs is of 'Generally minor significance' will be contested at any further EIP hearings and as and when individual applications come forward. Views are but one of the 'impacts' now required to be addressed under London Plan Policy D9 on 'suitability' of locations for tall buildings, as noted in the RBKC response to the PSMDLP modifications. 'Functional' impacts are another, and the poor public transport access levels at a proposed Mitre Way Cluster will not be forgotten by local residents.</p>	<p>No change proposed.</p> <p>The Preliminary Design and Cost Study supersedes the proposed modifications to the Scrubs Lane Development Framework Principles in relation to the proposed connection to Scrubs Lanes (IDP project TV3). The Local Plan figures show this as a necessary all modes route reflecting the most up to date information in the Preliminary Design and Cost Study. These requirements have been incorporated into the IDP and Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. The phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period.</p> <p>The Scrubs Lane Development Framework Principles is supported by a Strategic Views Assessment. The methodology undertaken for the updated assessment is consistent with the previous assessment undertaken in 2016 to support the Scrubs Lane Development Framework Principles. The assessment has been carried out in accordance with the Guidelines for landscape and Visual Impact Assessment (GLVIA), Third Edition (2013), An Approach to Landscape Character Assessment (2014), Landscape Institute and IEMA guidelines and policy set out in the NPPF (2012) and Historic England guidance. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The Infrastructure Delivery Plan sets out significant investments in transport to improve connections to the Mitre Way area. These investments include new walking and cycling connections to Old Oak Common Station, along Scrubs Lane and along the proposed Wormwood Scrubs Street. OPDC's Bus Strategy also demonstrates new and enhanced bus services to serve the area. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N
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118	Local Resident	Stephane	Michaelis		1		General	Support for community group comments			I, Stephane Michaelis, support the views of the St Quintin and Woodlands Neighbourhood Forum regarding the OPDC.	Noted. Please refer to the responses to the St. Quintain and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
119	Local Resident	Susan	M Wilson		1		Housing		H2		We consider this to be greedy speculation which does not serve ordinary working North Kensington residents. "Affordable Housing" is never affordable. Flats will be expensive, sold to investors often overseas.	No change proposed. OPDC has adopted a strategic 50% affordable housing target subject to the viability threshold set out in the 2021 London Plan. At least 30% of affordable housing is required to be social rent or London Affordable Rent. The remainder is required to be a mix of social rent/London Affordable Rent, London Living Rent or Shared Ownership.	N	
119	Local Resident	Susan	M Wilson		2		Places		P10		Air pollution in North Kensington exceeds WHO recommended limits ALL YEAR ROUND. This scientific data comes from Imperial College. Traffic congestion twice daily on the North Pole Roundabout tails back to ST Marks Rd. it is stationary, and children walk through it on their way to school. Litigation from parents can, after the Kissin Debra High Court Case, be expected. Scrubs Lane is the same, more traffic cannot be tolerated. Any housing built on Scrubs Lane must be designated traffic free.	No change proposed. OPDC's parking proposals are based on the requirements of the 2021 London Plan to link parking with PTAL scores. As Scrubs Lane has a range of PTAL scores it is not possible to designate the street car-free. However, developers that do provide car parking will be required to provide EV charging infrastructure to support electric vehicles, which will eliminate tailpipe emissions and improve air quality. It should also be noted that the Ultra Low Emission Zone is due to expand across the OPDC area and North Kensington in October 2021 requiring tighter emission standards from vehicles, which will contribute to an improvement in air quality in the short term.	N	

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119	Local Resident	Susan	M Wilson		3		Strategic Policies		SP9		<p>. Post Grenfell, the cladding scandals and the collapse of the. Miami Flats, these flats may not be economically viable. The model for this comes from ten years ago. The Director of the RIBA thinks many London high rise flats will never be inhabited.</p>	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. OPDC considers the proposed modifications are justified, supported by new and updated supporting studies.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Matters relating to the structural soundness of buildings and foundations are a building control matter</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
119	Local Resident	Susan	M Wilson		4		Places		P12		<p>Destruction of the skyline and beauty of the Scrubs.</p>	<p>No change proposed. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The assessment of the impacts of tall buildings undertaken as part of the Scrubs Lane Development Framework update has found that there is no increased impact on Wormwood Scrubs as a result of the proposed modifications.</p>	N	

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120	Local Resident	Suzie	Page		1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. OPDC considers that the proposed modifications to the Local Plan deliver a sound and appropriate spatial strategy for the OPDC area that is fully justified through a new and updated supporting studies.</p> <p>The removal of new all modes east-west routes within Old Oak North during the plan period and the removal of the Hythe Road Overground Station is recognised to change the movement network of the area. OPDC has been working closely with stakeholders to continue to deliver a high quality network through the delivery of proposed new connections, walking and cycling routes and amended bus routes. These are set out in the proposed modifications and evidenced in the new and updated supporting studies. Wormwood Scrubs Street continues to be proposed to deliver a new east-west all modes route in the long term in its western portion while its eastern portion has been accelerated to be delivered within the plan period.</p> <p>Proposed modifications to Policy P2 regarding Old Oak North also support the delivery of ancillary services and facilities to support place-making and activate key routes to support connectivity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption . This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF , reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
120	Local Resident	Suzie	Page		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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120	Local Resident	Suzie	Page		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	
120	Local Resident	Suzie	Page		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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120	Local Resident	Suzie	Page		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
120	Local Resident	Suzie	Page		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
120	Local Resident	Suzie	Page		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
120	Local Resident	Suzie	Page		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport. Policy T6 prevents new residents from applying for parking permits for CPZs in neighbouring streets.</p>	N	

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120	Local Resident	Suzie	Page		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
120	Local Resident	Suzie	Page		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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120	Local Resident	Suzie	Page		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
120	Local Resident	Suzie	Page		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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120	Local Resident	Suzie	Page		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
120	Local Resident	Suzie	Page		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	

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121	Local Resident	Tamas	Lanyi		1		General	Extent of changes			I am writing to raise my concern of the non residential friendly plan of OPDC's March 2021 Local Plan which has been revised since 2018 with major changes that will affect me and my family as a local resident of this area who has lived at my current address for almost 12 years	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	
121	Local Resident	Tamas	Lanyi		2		Strategic Policies		SP8		Unfortunately I am unable to recall any consultation with me or any local residents I am afraid , but I might be wrong...there are massive changes to this area, which quite impact our normal lives included but not limited to noise and dust pollution, heavy traffic, disappearing public green areas, etc. This will have a direct impact on our low-rise residential grounds and private greens spaces which will be used and abused by those who don't live here or pay for the up-keep and maintenance of the grounds, green spaces and footpaths. Also we have basic safety concern of increasing volume of public, non residential visitors who are using our private green areas which should be respected. The OPDC plan is should be included acceptable green territory.	<p>No change proposed.</p> <p>In addition to the protection and enhancement of existing green space, the Local Plan requires new development to contribute towards 30% of the developable land outside of SIL to be delivered as publicly accessible open space. This includes the creation of two new Local Parks of a minimum 2 ha in size located at Channel Gate and Old Oak South.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement.</p>	N	

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121	Local Resident	Tamas	Lanyi		3		Spatial Vision				In overall i'd like to raise my concern to the whole plan which is totally opposite of that to making liveable areas. As a resident I totally disagree this development plan, especially changing our area in negative way it is unacceptable.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
122	Land owner	Tasha	Liddiard	Tarmac Ltd	1		Employment		E1		Heatons have been instructed by our clients, Tarmac Trading Limited ('Tarmac') to prepare and submit a formal representation to the above consultation in relation to their ready mix plant (RMX) at Park Royal. A Site Location Plan showing Tarmac's facility is provided at Appendix 1 to this letter. The purpose of this letter is to ensure that the RMX plant is safeguarded for the long-term future, by policies contained within the emerging Local Plan. Specifically, the Main Modification changes proposed to land use designations c. 30m south of the plant from strategic industrial location (SIL) to a mixed used area, with a focus on housing development completion in the next 0-10 years.	Noted.	N	
122	Land owner	Tasha	Liddiard	Tarmac Ltd	2		Employment		E1		Site and Surrounding Context Tarmac's RMX plant is of strategic importance, providing a range of products for the construction industry which helps towards supporting the local and wider housing market and local economy. The RMX plant is situated on Park Royal Road (B4492) with the railway line running along the southern edge. The mixed use allocation area, listed as 'East of Park Royal Road' and 'West of Park Royal Road' in the Industrial Land Review Addendum 2021 (ILRA) are located c. 30m south of the RMX plant, south of the railway line (Paragraph 4.7 -Figure 5). The RMX plant itself is located along the southern boundary of the Strategic Industrial Location (SIL) designation contained within the emerging Plan (see Appendix 2)	Noted.	N	

122	Land owner	Tasha	Liddiard	Tarmac Ltd	3	Figure/PS2/OPDC/PM12; Figure/PS2/OPDC/2.2	Places	P4	<p>Policies Map</p> <p>Main Modification Consultation Changes Representations are being made in response to changes to 'Policies Map – Strategic Industrial Locations' Ref: Figure/PS2/OPDC/PM12 (see Appendix 2). The map shows the release of East of Park Royal Road and West of Park Royal Road from Strategic Industrial Location (SIL) to 'Spatial Vision' Map, Ref: Figure/PS2/OPDC/2.2 - a mixed use designation (see Appendix 3). The IRLA (2021) stipulates that this land, classified as mixed use, is to be predominantly released for housing with expected development completion over the next 10 years (Paragraph 4.15). Reasons for Change in Land Use Designation The IRLA (2021) has been produced in response to the Inspector's Interim Findings for Old Oak North and to ensure general conformity with the London Plan (2021) OPDC's housing target and industrial capacity. The IRLA made recommendations to retain, release, or designate sites within the Strategic Industrial Location (SIL). The Inspector's Interim Findings identified that increasing industrial land values, coupled with infrastructure and policy requirements rendered parts of Old Oak North unviable. Changes in approach for site allocations in the Old Oak North area has resulted in a knock on impact in terms of housing capacity with a shortfall of 3,000 homes in the emerging plan period. The study proposed to release various SIL designations to mixed use including the small parcels of land on Park Royal Road c. 30m south of Tarmac's RMX Plant so that they can contribute toward meeting OPDC's housing targets. Section 4 of the ILRA 2021 reviewed the proposal to re designate SIL areas to consolidate (intensify) the SIL elsewhere in order to deliver a net uplift in industrial floorspace. Paragraph 4.15 outlines the reasons East of Park Royal Road and West of Royal Road were released from SIL as follows: • "Sites are bounded by railway lines to the north and not contiguous with other SIL sites, which minimises potential wider impacts. They are also bounded by open space and/or residential uses • Proximity/access to public transport • The western site is currently outside of the designated SIL area and planning permission has been granted which allows for the introduction of new homes on part of this site." The ILRA 2021 estimates a potential development capacity of around 75 homes in the first ten years of the Plan (Paragraph 4.16). Relevant Planning Policy Based on the policy map changes, the appearance and use of the land c. 30m south of the RMX plant will change over the next 0-10 years to meet the housing targets set within Greater London and OPDC itself. Therefore, Local Plans need to be robust to ensure that planning policies are in line with the NPPF and the London Plan (2021) specifically in regard to safeguarding and support of the agent of change principle to protect developments within a SIL from adjacent nonindustrial development. Paragraph 204 of the NPPF state the importance of "safeguarding existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products...". Paragraph 182 stipulates that "planning policies need to ensure that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established", (i.e. Tarmac's RMX plants ability to carry out it's function should not be hindered by new development). The paragraph continues to state that "where operations of an existing business could have significant adverse effect on new development in its vicinity, the applicant ('agent of change') is required to provide suitable mitigation before development is completed". In the context of Tarmac's RMX plant, local planning policies need to ensure that planning permission within mixed used designations c. 30m south enact the agent of change principle as per national planning policy. London Plan (2021) Tarmac acknowledge that the London Plan (2021) lists the OPDC as an 'Opportunity Area' which through regeneration should aim to provide 25,500 homes and 65,000 jobs and being a key driver in meeting the London housing target supports regeneration of OPDC (Table 2.1 and Paragraph 2.1.59). However, the London Plan (2021) also stipulates that 'Park Royal is a strategically-important industrial estate for the functioning of London's economy and should be protected, strengthened and intensified' (Paragraph 2.1.61). Policy E5 of the London Plan Strategic Industrial Locations (SIL) states that Development Plans in Boroughs should 'develop local policies to protect and intensify</p>	<p>No change proposed. The West of Park Royal Road and East of Park Royal Road sites are considered to be suitable and developable for housing and there is potential for this site to be released from SIL with the key reasons for this summarised below: • Sites are bounded by railway lines to the north and not contiguous with other SIL sites, which minimises potential wider impacts. They are also bounded by open space and/or residential uses. • Proximity/access to public transport • The western site is currently outside of the designated SIL area and planning permission has been granted which allows for the introduction of new homes on part of this site.</p> <p>We note your reference to c30m separation distance between the Tarmac site from the sites proposed for release. Railway lines span this gap so the sites are not contiguous.</p> <p>Existing national and London Plan policies as well as the Local Plan policies, related to the agent of change, development within or adjacent to SILs, and safeguarding sites for the batching and manufacture of concrete products would be assessed as part of planning applications where relevant.</p> <p>In order to keep the OPDC Local Plan spatial and succinct, the Local Plan does not seek to repeat policies already contained in the NPPF and 2021 London Plan. The Local Plan should be read in conjunction with the national planning policy and the London Plan. Relevant national and London Plan policies would be assessed as part of planning applications.</p>	N
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											<p>the function of SILS..' and with regard to development adjacent to SILS the policy reiterates that, "development proposals within or adjacent to SILS should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILS should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development".</p> <p>The London Plan has designated a specific policy to the agent of change principle. 'Policy D13 Agent of Change Principle' states that, "The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generation activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby"</p> <p>"Development should be designed to ensure that established noise and other nuisancegenerations uses remain viable and can continue or grow without unreasonable restrictions being placed on them".</p> <p>OPDC Post Submission Modified Draft Local Plan (May 2021) Paragraph 1.20 of the OPDC post submission Local Plan (subject to Main Modifications) states</p> <p>that policies in this Local Plan are consistent with the version of the National Planning Policy Framework (NPPF) published in 2012 and in general conformity with the London Plan (2021). The main policy text for 'Policy E1: Protecting, Strengthening and Intensifying the Strategic Industrial Location' of the OPDC Local Plan does not mention safeguarding of SIL against adjacent mixed use development nor does it reference that decision making should consider the OPDC Plan and the London Plan. However, it is noted the supporting text of 'Policy E1: Protecting, Strengthening and Intensifying the Strategic Industrial Location' at paragraph 9.11, supports the London Plan (2021) and NPPF guidance that OPDC will apply agent of change principle in accordance with 'Policy D5: Amenity' when considering the impact of proposals adjacent to SIL to ensure development will not harm the functioning of existing or future employment and industrial activities in SIL.</p> <p>Policy D5 includes the agent of change principle by stating that to obtain planning permission "proposals will be required to deliver an appropriate standard of amenity through implementing the Agent of Change principle so that new development does not materially affect the ongoing functioning of existing employment uses and/or town centre uses; and new development does not cause unacceptable harm to the amenity of existing uses" The subtext at paragraph 5.49 specifically highlights that 'the onus will be on the applicant (as the Agent of Change) to demonstrate that existing uses can continue to function and/or that their amenity is not unacceptably harmed.</p>			
122	Land owner	Tasha	Liddiard	Tarmac Ltd		4	Employment		E1		<p>Implications and Conclusion As well as protecting the function of SIL, mineral infrastructure such as Tarmacs RMX plant requires safeguarding in accordance with the requirements of the NPPF and the London Plan.</p>	<p>No change proposed. We note your references to the NPPF regarding safeguarding existing sites for the batching and manufacture of concrete products. In order to keep the OPDC Local Plan spatial and succinct, the Local Plan does not seek to repeat policies already contained in the NPPF and 2021 London Plan. The Local Plan should be read in conjunction with the national planning policy and the London Plan. Relevant national and London Plan policies would be assessed as part of planning applications, including those that seek safeguarding of existing sites.</p>	N	

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122	Land owner	Tasha	Liddiard	Tarmac Ltd	5		Places		P4		Tarmac do not object to the small parcels of land at Park Royal Road being re-designated to mixed use based on the evidence provided in the IRLA (2021). However, concerns are raised due to the importance of safeguarding the mineral infrastructure and SIL coupled with the pressing need for housing development in the emerging OPDC local plan could result in conflicts of interests from adjacent land use designations. Local plan policies therefore need to be robust and effective in upholding safeguarding of mineral infrastructure and applying the agent of change principle in all future planning decisions.	<p>No change proposed. The West of Park Royal Road and East of Park Royal Road sites are considered to be suitable and developable for housing and there is potential for this site to be released from SIL with the key reasons for this summarised below:</p> <ul style="list-style-type: none"> • Sites are bounded by railway lines to the north and not contiguous with other SIL sites, which minimises potential wider impacts. They are also bounded by open space and/or residential uses. • Proximity/access to public transport • The western site is currently outside of the designated SIL area and planning permission has been granted which allows for the introduction of new homes on part of this site. <p>We note your reference to c30m separation distance between the Tarmac site from the sites proposed for release. Railway lines span this gap so the sites are not contiguous.</p> <p>Existing national and London Plan policies as well as the Local Plan policies, related to the agent of change, development within or adjacent to SILs, and safeguarding sites for the batching and manufacture of concrete products would be assessed as part of planning applications where relevant.</p> <p>In order to keep the OPDC Local Plan spatial and succinct, the Local Plan does not seek to repeat policies already contained in the NPPF and London Plan. The Local Plan should be read in conjunction with national planning policy and London Plan policy. The agent of change principle is embedded throughout the Local Plan and in particular in Policy D5.</p>	N	
122	Land owner	Tasha	Liddiard	Tarmac Ltd	6		Design		D6		Tarmac support the inclusion of the agent of change principle within Policy D5 Amenity of the OPDC Local Plan. However we would request a definition or reference to the London Plan policy to define what constitutes 'material affect' is included. The London Plan (2021) specifically Policy D13 identifies material affect as "development should be designed to ensure that established noise and other nuisance-generations uses remain viable and can continue or grow without unreasonable restrictions being placed on them". It would be preferable to ensure that the OPDC define 'material affect' as per the London Plan and applications for new development and consultation on any assessment work prepared to demonstrate there is no material effect is presented to the operator/landowner of the land affected.	No change proposed. This is already set out in 2021 London Plan policy D13B. In order to keep the OPDC Local Plan spatial and succinct, the Local Plan does not seek to repeat policies already contained in the NPPF and London Plan. The Local Plan should be read in conjunction with the national planning policy and the London Plan. Relevant national and London Plan policies would be assessed as part of planning applications.	N	
122	Land owner	Tasha	Liddiard	Tarmac Ltd	7		Employment		E1		Furthermore, Policy E5 of the London Plan (2021) provides more detail with regard to new development in the nearby vicinity of SILS where development "should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis". We would welcome addition of wording to clarify this in regard to development within OPDC to ensure it is clear to developers that the SIL designations are safeguarded.	No change proposed. This is already set out in 2021 London Plan policy E5D. In order to keep the OPDC Local Plan spatial and succinct, the Local Plan does not seek to repeat policies already contained in the NPPF and 2021 London Plan. The Local Plan should be read in conjunction policy E5. Relevant national and London Plan policies would be assessed as part of planning applications.	N	
122	Land owner	Tasha	Liddiard	Tarmac Ltd	8		Employment		E1		The OPDC post submission draft local plan specifies the plan will be in 'general conformity' to the London Plan (2021) (Section 1.20). Tarmac support Policy D5 of the OPDC post submission local plan however due to the lack of clarity of 'material affect', planning decisions, with particular regard to the mixed use development c. 30m south of the RMX plant should be heavily supported by Policy D13 and E5 of the London Plan (2021) which provide more detail with regard to 'unreasonable restrictions' stipulated in the NPPF.	<p>No change proposed. Provisions are already set out in 2021 London Plan policies D13 and E5 as well as the NPPF.</p> <p>Existing national and London Plan policies as well as the Local Plan policies, related to the agent of change, development within or adjacent to SILs, and safeguarding sites for the batching and manufacture of concrete products would be assessed as part of planning applications where relevant.</p> <p>In order to keep the OPDC Local Plan spatial and succinct, the Local Plan does not seek to repeat policies already contained in the 2021 London Plan. The Local Plan should be read in conjunction with London Plan policies D13 and E5 as well as the NPPF. Relevant national and London Plan policies would be assessed as part of planning applications.</p>	N	

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123	Land owner	Chris	Ridout	TfL Commercial Development	1		General	General			Thank you for providing the opportunity to comment on the Old Oak and Park Royal Development Corporation (OPDC) Local Plan Main Modifications. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner and leaseholder of land in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. TfL CD have engaged through the Local Plan preparation process and have submitted the following representations: – Old Oak and Park Royal Development Corporation Local Plan Regulation 19 (September 2017). – Old Oak and Park Royal Development Corporation Local Plan 2nd Regulation 19 (July 2018).	Noted.	N	
123	Land owner	Chris	Ridout	TfL Commercial Development	2	MM/PS2/OPDC/P1/18	Places		P1		TfL have a long leasehold on the Old Oak Common Elizabeth Line Depot and TfL CD would be open to working with OPDC to enable this site to come forward for mixed use development should a suitable solution to its earlier delivery be found. It is noted that the following text has been added to paragraph 4.18: “In the long term there is also the potential to explore the delivery of an additional Local Park in Old Oak South through the release of the Elizabeth Line Depot for development if demonstrated to be feasible” The inclusion of the wording ‘potential to explore’ and ‘if demonstrated to be feasible’ are supported as any requirements for this longer term site should be based on further detailed assessment at the appropriate time.	Noted.	N	
123	Land owner	Chris	Ridout	TfL Commercial	3	MM/PS2/OPDC/P7/1	Places		P7		The increase in the number of new jobs and new homes within Policy P7 is supported.	Noted.	N	
123	Land owner	Chris	Ridout	TfL Commercial	4		General	General			Concluding Remarks We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.	Noted.	N	
124	Infrastructure provider	Chris	Colloff	Thames Water Utilities Ltd	1		General	General			I refer to the above consultation on the OPDC Local Plan Main Modifications. Thames Water are the statutory sewerage and water undertaker for the area and is therefore a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012.	Noted.	N	

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124	Infrastructure provider	Chris	Colloff	Thames Water Utilities Ltd	2	MM5/PS/Q3k	Environment and Utilities		EU3	6.36	Thames Water support the proposed changes to Policy EU3 set out in Main Modification MM5/PS/Q3k which include the addition of a requirement for any controlled release of water into the combined sewer to be agreed by the borough and Thames Water. It is noted that the text in Section 6.36 has been amended to clarify that the capacity concerns relate to the Counters Creek catchment area and not the sewer. The amendment (ref MINOR/2/EU3/18) indicates that there is no capacity within the catchment to accept increased flows. For clarity, 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. The changes proposed through MM5/PS/Q3k will help ensure that flows to the network from new development are agreed with Thames Water.	Noted.	N	
124	Infrastructure provider	Chris	Colloff	Thames Water Utilities Ltd	3		Environment and Utilities		EU3		The proposed changes to remove Channel Gate and other locations from SIL for mixed use development will have an impact on water and wastewater requirements. This impact will depend on the details of development including the number of residential units to be provided on the sites, the timing of delivery and the points of connection to the network together with the details of how the sites will deal with surface water flows on the development in line with the IWMS. Thames Water are keen to work with developers and the Development Corporation to ensure that development is aligned with any necessary upgrades to the water and wastewater network required to support it. We therefore encourage developers to engage with us at an early stage prior to the submission of any application to discuss the water and wastewater infrastructure requirements for new development. This process will help with ensuring that any flows to the combined sewer network are agreed in line with Policy EU3.	Noted.	N	

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125	Local Resident	Theresa	Magee		1		Design		D5		High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well.	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
125	Local Resident	Theresa	Magee		2		Housing		H3		Most of the high rise buildings that have been built in this area (North Acton) could not be called homes, they are mainly aimed at students and young people .Since most of these would be transient tenants they would not have any interest in the local area. Again most of these building ,have their own bar and restaurant, also of course the obligatory gym .There wont be too many families with children or older people there, simply because there are no facilities there for them.	No change proposed. The Local Plan has policies to achieve mixed and balanced communities through the delivery of a range of housing typologies to meet a range of housing needs, including affordable housing. The Local Plan also has policies to secure high quality design and in tandem with the 2021 London Plan, sets standards for internal space, private amenity space daylight and sunlight, as well as other factors which ensure that new developments deliver high standards of health and well-being for residents. In addition, the Local Plan is providing new green spaces, social and community facilities for the benefit of existing residents as well as new residents.	N	
125	Local Resident	Theresa	Magee		3		Town Centre and Community Uses		TCC7		The local pubs and clubs we did have, are simply being demolished, the older generation enjoyed their sing song at the weekend and also the family parties and local celebrations, that the local always done so well. It may not have been part of the plan to get rid of the local social centers, but it certainly is a consequence of it, all these new wine bars and retro pubs that are part of the new buildings, may be wonderful for the local young people if they can afford it. But they are doing nothing for the local community.	No change proposed. The protection of existing public houses is addressed through Policy TCC7 (Public Houses) of the Local Plan. This Policy sets requirements which must be satisfied for OPDC to consider the loss of an existing pub as part of a proposed development. In summary this includes: <ul style="list-style-type: none"> - The requirement for the existing public house to be competitively marketed for a period of two years, and for it be clearly demonstrated that the pub is no longer economically viable; - That an assessment is undertaken of the surrounding area to identify facilities which offer similar community benefit to the public house; - The need to consult the community on the value of the public house to demonstrate that its loss doesn't also result in the loss of a valuable community asset. 	N	

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125	Local Resident	Theresa	Magee		4		Strategic Policies		SP9		<p>During this pandemic it has been stressed over and over again how the social isolation has effected the mental health, of people of all ages even the very young , have suffered.</p> <p>These tall building are causing social isolation and generational segregation that is going to last, well into the future. If families did decide to live in one of these buildings where on earth would the children play, How would the older generation manage to get about, they could not use North Acton station, the residents who live in the area can't use it, the disabled entrance is not fit for purpose.</p>	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that developments delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
125	Local Resident	Theresa	Magee		5		Environment and Utilities		EU4		<p>I have seen some plans for tall building with roof gardens on top, I may be wrong but wont the air on top be very polluted.</p>	<p>No change proposed. Air quality is usually better at height as pollution gets dispersed as it rises.</p>	N	
125	Local Resident	Theresa	Magee		6		Transport		SP7		<p>High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Since the lockdown traffic has increased all around this local area, All day delivery vans, and bikes are dropping off all sorts , food , amazon parcels, pharmacy deliveries, and supermarket deliveries.</p> <p>These vehicles although increasing the traffic do not stay in the area. We are a CPZ zone 2 hours in the morning and 2 hours in the afternoon, we do not see a traffic warden every day . Ealing tell us they are short staffed. Often the main problem is in the evening , residents return from work ,but cant park anywhere near their homes . Nearby residents who live in car free homes, and are told that they can't have a car, come down the road and park on our streets, Our councillor has told us the only solution is to be 24 hours CPZ. Not everyone can afford this, and why should we have to pay, because of a problem the council and yourselves , have created. Again if we did go 24 hours there is no guarantee that it will solve the problem, If Ealing don't have the staff to police the area for 4 hours, how are they going to police day and night.</p>	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport. Policy T6 prevents new residents from applying for parking permits for CPZs in neighbouring streets. Monitoring of CPZs is the responsibility of the highways authorities.</p>	N	

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125	Local Resident	Theresa	Magee		7		Town Centre and Community Uses		SP6		<p>This 2021 version of the draft , refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. This is proof that what I say is correct, these are not homes they are student accommodation, and will do nothing for the local area. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a.</p>	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
125	Local Resident	Theresa	Magee		8		Town Centre and Community Uses		TCC3		<p>I am a long time resident of this area , I am not a builder or developer. I often go to meetings to view plans that are being put forward for the area. Young people try to explain these plans to me .It all sounds wonderful but there is something missing . There is no sense of community , there is nothing to attract a family to come and build their future here.</p> <p>We don't have any new schools , we don't have new health centres , there are no libraries. There are meeting rooms in some of the building , but they are not community centres, local residents don't really have any say in these.</p> <p>The mayor might want X numbers of homes, please take into consideration that people need more that 4 walls, they need a sense of belonging in an area they feel proud to live in. Somewhere they will be known to their neighbours , and were neighbours look out for each other. That's what a community is all about.</p>	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area which will result in a mixed new community, and provide benefits for existing neighbourhoods and local economies.</p> <p>The Local Plan is supported by a Social Infrastructure Needs Study (SINS), which identifies the social infrastructure necessary to support new development identified in the Plan. The study has identified the capacity that exists in existing social infrastructure to support early years of development, what new facilities are required on-site and when and where they should be delivered.</p>	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
126	Local Resident	Thomas	Newman		1		General	Extent of changes			<p>First of all the consultation letter sent to households in May was inadequate and misleading. This said '<i>much of our draft Local plan hasn't changed</i>'. But actually there were substantial changes that will impact the entire area. there are big changes affecting where we live.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process. OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation, receiving over 11,000 individual responses. This reflects that the majority of the Local Plan remains unchanged.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard.</p> <p>To ensure this, we delivered a transparent, comprehensive and accessible best-practice 7-week consultation process that used a hybrid approach to enable people to respond both online and offline. This exceeded our Statement of Community Involvement requirements.</p>	N	

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126	Local Resident	Thomas	Newman		2		General	Delay or withdraw the plan			<p>Rather than a 'modified' version of a Plan that has got progressively worse since 2018, The plan really should be started again given the degree of change and the changed environment with the pandemic. Old Oak Common Station will not be open for 8-12 years soonest. There is time to plan for a new part of London that will look to changes impacting london due to the pandemic and climate change.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

126	Local Resident	Thomas Newman	3	Places	P10C5	<p>The 'modification' numbered MM/PS2/OPDC/P10C5/1 proposes high density development north of Little Wormwood Scrubs, at the end of Mitre Way. More residential towers are also planned for Scrubs Lane. Why was the public not made aware and allowed to object? It appears that the authority is trying to clandestinely add it to the plans so there will not be any objections. The developments will totally destroy the views from local open spaces negating the purpose of open spaces for north Kensington residents.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. North Pole Depot was identified as a potential housing site outside of the Local Plan period. The phasing of this site has been brought forward to accord with there now being greater certainty in terms of its deliverability in the short to medium term.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. These reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. 	N
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Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
												<ul style="list-style-type: none"> • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. • An open offer for officers to attend community events and hold one-to-one meetings with community members. • A dedicated phoneline, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. • Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. 		
126	Local Resident	Thomas	Newman		4		Places			P10	There is inadequate transportation in the area to build more high density towers. Extra buses will do little to improve access to public transport. With no new Overground station at Hythe Road (MM/PS2/OPDC/P2/1) why is this 'modified' Plan proposing yet more housing units in Scrubs Lane as compared with the 2018 version. The previous housing numbers should come down at locations where public transport is inadequate.	No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.	N	
126	Local Resident	Thomas	Newman		5		Places			P10	High density housing which is 'car-free' does not mean 'vehicle free'. This Plan takes no account of the growth of Uber and delivery vehicles.	No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport.	N	
126	Local Resident	Thomas	Newman		6		Places			P10	Nothing seems to be planned as additions or changes to address the local road network. Traffic at North Pole Road and its junction at Wood Lane/Scrubs Lane is already shoung long tail backs at commute times. This will only get worse with the plans. Why is a new Local Plan not dealing with this issue?	No change proposed. The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. The junction of Scrubs Lane, Wood Lane and North Pole Road is located just outside the OPDC Local Plan boundary and OPDC is therefore not planning for transport improvements at this location.	N	

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127	Local Resident	Thomas	Nutt		1		General	Support for community group comments			Hello, please note that I support the view put forth by St Quintin and Woodlands Neighbourhood Forum - especially in regards to concerns re: local road network & transportation.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
127	Local Resident	Thomas	Nutt		2		General	Delay or withdraw the plan			We live in a new post covid context and i feel this needs to be carefully taken into consideration re: any current or new plans.	<p>No change proposed. OPDC considers that the proposed modifications deliver a sound plan that continue to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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128	Local Resident	Tom	Dark		1		General	Delay or withdraw the plan			<p>As a resident of Wells House Road, just off Old Oak Common Lane, I write to you with grave concerns for the future of this local area and the community that live within it. I really hope you will give thorough and serious consideration of local residents' concerns, and that plans can be modified in a way that work for everyone.</p> <p>The March 2021 version of your Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak. Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works better for the needs of Londoners and for Old Oak Common residents, old and new.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
128	Local Resident	Tom	Dark		2		Design			D3, D4	<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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128	Local Resident	Tom	Dark		3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
128	Local Resident	Tom	Dark		4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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128	Local Resident	Tom	Dark		5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
128	Local Resident	Tom	Dark		6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on already heavily congested roads are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
128	Local Resident	Tom	Dark		7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
128	Local Resident	Tom	Dark		8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. New residents at the Oaklands high-rise complex are bound to include car owners, they will have no choice but to use our streets for their parking. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport. Policy T6 prevents new residents from applying for parking permits for CPZs in neighbouring streets.</p>	N	

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128	Local Resident	Tom	Dark		9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
128	Local Resident	Tom	Dark		10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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128	Local Resident	Tom	Dark		11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy TCC2 controls the location and concentration of hot food takeaways.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
128	Local Resident	Tom	Dark		12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any high rise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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128	Local Resident	Tom	Dark		13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
128	Local Resident	Tom	Dark		14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <p>If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts.</p>	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrated how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
128	Local Resident	Tom	Dark		15		General	Delay or withdraw the plan			<p>We are losing areas of the highly valued green space of Wormwood Scrubs to HS2... New station developments will continue for the best part of a decade, with continual road closure and traffic chaos ... New high rise builds can be seeing going up in every direction from Wells House Road... Speaking as a local resident, the situation in the local area is exceedingly detrimental to the quality of life to all of us on this road. We please urge you to review your plans and take the needs of those already living in this area into consideration.</p>	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners. A temporary planning application for an alternative construction access road for HS2 (ref 21/0001/FULOPDC) was granted planning permission by OPDC planning committee on 23 February for a period of 18 months. This requires mitigation measures to be implemented as set out in the Ecological Appraisal and Arboricultural Report.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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129	Local Resident	Una	Burnand		1		General	General			I am writing in response to the above plan in my capacity as a Hammersmith and Fulham resident who is also a frequent visitor to Wormwood Scrubs open space. I've lived in this area for over 25 years. I am a trustee/committee member of Friends of Wormwood Scrubs and this is my personal response to the plan. I know The Friends and many other individual neighbours are making their own representations, so I am focussing on a limited number of objections.	Noted.	N	
129	Local Resident	Una	Burnand		2		Places		P12		<p>1. The exploitation of Wormwood Scrubs beyond what it can sustain. The plan as a whole has totally insufficient provision for open, green recreational space for so many new residents and workers, so they will have few choices other than to go to Wormwood Scrubs. Yet the OPDC seems to have made no provision whatsoever for protecting the fragile natural habitat of Wormwood Scrubs from such massively increased footfall. Wormwood Scrubs as a natural habitat will suffer terribly yet - just one example - the plan actually refers to "vegetation" as an obstacle to be cleared away to enable cyclists and walkers travelling from the north to "access" the Scrubs more easily! Presumably this means cutting down more woodland, just after HS2 have cut down a lot already?</p> <p>How is destroying vegetation in order to save some cyclists the trouble of cycling a few yards further down Scrubs Lane helping the already severely stressed species clinging to existence on Wormwood Scrubs?</p> <p>The impression is given that underlying this kind of suggestion, and the plans for Wormwood Scrubs in general, is a powerful desire to exploit the green space as much as possible, using its presence to liberate developers from the obligation to allow for recreational space in their own plans and thus to cram in more buildings. The Scrubs as we know it will wither as a biodiverse habitat for birds and other species.</p>	<p>No change proposed. Policy SP8 requires 30% of the developable land outside of SIL to be provided as public open space in order that the open space requirements from the regeneration of the area are appropriately met on-site.</p> <p>Policy P12 protects Wormwood Scrubs as Metropolitan Open Land and as an are of ecological value. Any proposals involving impacts on areas of ecological value would need to reprovide a net gain in biodiversity in accordance with Policy EU2. Both Policy P12 and EU2 remain largely unaltered since the submission of the Local Plan.</p> <p>Providing improved access to Wormwood Scrubs is justified to support it's role as a Metropolitan Park serving the wider West London area, and it's role as set out in the Wormwood Scrubs Act. Any proposals for such improvements would need to be undertaken in agreement with the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust.</p>	N	
129	Local Resident	Una	Burnand		3		Spatial Vision				<p>2. The lack of awareness of needs post-pandemic I feel the spirit of the plan is entirely pre-pandemic, lacking forethought as to what London and Londoners need, and what nature needs post-pandemic.</p> <p>A bolder vision could have included a new rewilding project, for example, perhaps contiguous to the Scrubs - and far more green space.</p> <p>A bolder vision would have included lower density housing with more scope for communal gardens in which residents can do their own gardening, instead of being limited to the occasional balcony tomato plant.</p> <p>A bolder vision would have recognised that nature and the natural world needs to be protected, not merely exploited.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area that is an exemplar in healthy and sustainable large-scale development.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity. Policy D5 requires development to deliver private and communal open space in accordance with Mayoral guidance and requires development to provide space for food growing.</p>	N	

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129	Local Resident	Una	Burnand		4		Design		D4		<p>3. Lack of awareness of the impact of tall buildings As the plan stands, the many tall buildings around the area will block out sunlight and rain for most of the day and create dark, arid wind tunnels (for example, at Old Oak Gardens and Stamford Gardens). The proposed small green spaces in their vicinity will be of limited biodiversity, inaccessible and inhospitable to species and suffering heavy human footfall. Tall buildings also create a boxed-in, claustrophobic feeling on the Scrubs similar to that at Central Park in New York, which I would hold up as a perfect example of what we do NOT want the Scrubs to look like.</p>	<p>No change proposed. Local Plan policies SP8 and P12 require that development conserves and enhances Wormwood Scrubs in its role as a Metropolitan Park and Metropolitan Open Land for use by all Londoners.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The Scrubs Lane Development Framework Principles is supported by an updated Scrubs Lane Strategic Views Assessment that assessed the proposed modifications to policy P10 buildings heights guidance in relation to the impact on heritage assets and townscape. The updated outcome of the assessment has not changed.</p> <p>Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
129	Local Resident	Una	Burnand		5		Strategic Policies		SP8		<p>4. Unrealistic and/or vague attitude to nature In the different sections of the plan, there are references to "enhancing" green spaces and even to "relocating" nature reserves such as Birchwood Nature Reserve. It is not clear what "enhancing" means. Relocation of a nature reserve is not a realistic aim if the preservation of nature is required - a habitat cannot be simply "relocated" and planting saplings in another place is not the same thing.</p>	<p>No change proposed. The purpose of SP8 is to ensure that development protects and enhances green and public space and ensuring that if there is any loss, there is re-provision to an equal or better quantum and quality. The meaning of enhancement is to improve areas of ecological value.</p>	N	
129	Local Resident	Una	Burnand		6		Environment and Utilities		EU1		<p>There are unintelligible references to "integrating green spaces" (what does this mean?), to "providing access to nature" with scant reference to how nature is to be protected from our access to it. The images used to give us an idea of what the area will look like feature bleak concrete pavements and the astroturf steps at Kings Cross Granary Square - astroturf is probably one of the most significantly malevolent attacks on the natural world around in London today - it smothers the earth, leaves plastic residue and confuses birds who waste valuable energy landing on it and trying to find food.</p>	<p>No change proposed.</p> <p>The regeneration of the OPDC area will be underpinned by a comprehensive network of green infrastructure, which will need to serve the needs of both people and nature.</p> <p>All proposals will need to ensure at least a net gain in biodiversity and proposals for new public open spaces will need to be accompanied by a management plan setting out how of areas of biodiversity will be maintained and managed in the longer term.</p> <p>Proposals will also be required to undertake an Urban Greening Factor (UGF) assessment in order to optimise urban greening within development.</p>	N	

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129	Local Resident	Una	Burnand		7		General	Delay or withdraw the plan			I cannot see why this plan has to be accepted in its present form. There should be no rush and it should be completely reconsidered. If the pandemic has taught us anything it is that our relationship with nature should be rethought.	<p>No change proposed.</p> <p>OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area.</p> <p>As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p>	N	

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130	Local Resident	Victoria	Flemington		1		Places		P10C5		objection to further housing being constructed on the periphery of Little Scrubs Park. I live opposite this park and use it regularly.	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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130	Local Resident	Victoria	Flemington		2		Places		P10C5		<p>Already the removal of the park wall and the replacement with a far cheaper fence, means that we can see cars and a road. Little Scrubs and Wormwood Scrubs are vital to this area of quite high density housing – vital for people’s mental health. lockdown proved just how much these wild and open spaces are needed by this community. Now you are intending to have buildings looming over the space. Have we learnt nothing from the past....or from Grenfell?</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The principle for delivering clusters where east-west routes meet Scrubs Lane to support legibility and access to transport services and active uses through the coordinated delivery of tall buildings is well established and defined in the Scrubs Lane Development Framework Principles. DfT own the North Pole East Depot site and have confirmed in their Statement of Common Ground that the site can be delivered within the plan period. This enables the delivery of the eastern portion of Wormwood Scrubs Street within the plan period providing a connection from Scrubs Lane to the Kensal Canalside Opportunity Area in RBKC. This therefore enables the establishment of a cluster for walk-to town centre uses in accordance with the principles set out in the Scrubs Lane Development Framework Principles. The Scrubs Lane Development Framework Principles is support by a Strategic Views Assessment. This considered views from Wormwood Scrubs and Little Wormwood Scrubs. This concluded that the focused locations of tall buildings in clusters is appropriate subject to ensuring development is of a high quality. The Local Plan and London Plan provide policies to ensure this is secured through the development management process.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately, in relation to heights and views, to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>OPDC's Local Plan policy SP8 requires 30% of development to be public open space. Policy P10 and P10C5 support improved sensitive access to Little Wormwood Scrubs. This policy will be implemented alongside LBHF's Local Plan policy OS1 to improve Little Wormwood Scrubs as an existing park within LBHF making use of planning obligations secured through the development management process.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p>	N	

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130	Local Resident	Victoria	Flemington		3		Places		P10C5		I see no reason why further housing is needed in this area. The amount of residential construction in Old Oak Common and at Westfield is phenomenal. We have yet to see the effect of the pandemic on London's population so it seems to me, wholly unnecessary to plan further high density housing when there just may not be a need...at the expense of one of the remaining green spaces.	No change proposed. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Additionally, in March 2020, prior to the adoption of the London Plan, the Secretary of State for Housing, Communities and Local Government (MHCLG) wrote to the Mayor of London asking him to make modifications to the London Plan. The Secretary of State HCLG advised the Mayor that every part of the country must take responsibility to build the homes their communities need. This means build more, better and greener homes through encouraging well-planned development in urban areas, preventing unnecessary urban sprawl to protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land. More recently, the Secretary of State for MHCLG's Ministerial Statement (16 December 2020) regarding housing needs identified a growing need for London to increase its housing capacity and supply to meet housing needs. These Government statements point to an increased need for housing since OPDC submitted its Local Plan.	N	
130	Local Resident	Victoria	Flemington		4		Places		P10		With regards to access roads – already Wood Lane and Barby Rad are traffic nightmares. I cycle rather than drive and after about 3pm the St Quintin's Triangle is gridlocked, leading to traffic bound Wood Lane – and that is while a lot of people are still working from home. Even last night the Bracewell Road and Brewster Gardens were also clogged with traffic – how is this possible at 6pm when England is playing in the Euros... this is pretty much a constant problem for the residents of North Kensington.	No change proposed. OPDC considers that the proposed modifications are sound. Scrubs Lane will continue to be well served by public transport networks and active travel networks that continue to address existing barriers to movement. The Infrastructure Delivery Plan sets out the infrastructure investment needed to support homes and jobs proposed in the OPDC area. Investments in Hammersmith & Fulham area include upgrades to Scrubs Lane including the delivery of a two-way, segregated cycle lane, and a new pedestrian/ cycle bridge linking Scrubs Lane to the eastern entrance of Old Oak Common station via the Grand Union Canal. The Infrastructure Delivery Plan sets out a comprehensive set of proposals to upgrade existing streets and junctions and propose new connections where needed. If development proposals do give rise to adverse impacts on nearby routes and junctions, the Local Plan and Infrastructure Delivery Plan identify that contributions would be secured towards necessary enhancements. A bus strategy has been prepared by TfL to ensure that there is a sufficient bus network to serve the growth proposed in the OPDC area. In addition, the Infrastructure Delivery Plan sets out a comprehensive network of street improvements and new routes to facilitate walking and cycling. Policies within the Local Plan seek to minimise car parking and ensure that impacts on the road network during construction are minimised.	N	
131	Land owner	James	Kon	Wards of London Properties	1		General	General			On behalf of our client, Ward of London Properties, we hereby submit representations in response to the Old Oak and Park Royal Development Corporation (OPDC) Post Submission Modified Draft Local Plan, published for consultation on 5th March 2021. These representations are supported by and should be read together with: 1. A report prepared by Ove Arup & Partners Ltd (Arup) providing advice on the waste provision and potential compensatory provision for the Site. 2. A masterplan feasibility option prepared by Allies & Morrison for a mixed use residential led scheme at the Site.	Noted	N	
131	Land owner	James	Kon	Wards of London Properties	2		Places		P4		These representations are submitted at this particular stage of the consultation for the following reasons, analysed in more detail below: (a) There was no mention of the Site at all in the early versions of the draft Local Plan, including the version submitted to the Secretary of State for examination.	No change proposed. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. The WLWP was adopted in 2015 and the 100 Twyford Abbey Road site was identified as an existing site at this time. We note from your response that the site is currently in waste use.	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
131	Land owner	James	Kon	Wards of London Properites	3		Places		P4		(b) The latest version of the OPDC's Post Submission Modified Draft Local Plan confuses the Site with the Twyford Waste Transfer Station ("TWTS") which lies to the north of the Site on Abbey Road. This must be addressed because the TWTS is allocated in the West London Waste Plan ("WLWP") for waste apportionment purposes whereas the Site is not. The development potential of the two sites is therefore significantly different. See below: Part 1: CORRECTIONS REQUIRED TO OPDC'S POST SUBMISSION MODIFIED DRAFT LOCAL PLAN	No change proposed. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. The WLWP was adopted in 2015 and the 100 Twyford Abbey Road site was identified as an existing site at this time. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. OPDC Local Plan policy EU6 is also in general conformity with the 2021 London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use. Policy P2b) refers to the allocated Twyford Waste Transfer Station. However, other waste sites are safeguarded as required by Policy EU6 and set out in London Plan policy SI9.	N	
131	Land owner	James	Kon	Wards of London Properites	4		Places		P4		(c) The Inspector's interim report dated 10 September 2019 required the deletion of the Cargiant Old Oak North, EMR and Triangle Business Estate allocation from the draft Local Plan. These sites were originally allocated to contribute to housing capacity in the OPDC area (total of 7000 homes for the 20 plan period) and for commercial intensification (circa 600 jobs) and the decision to delete these sites from the original allocation represents a seismic shift in the overall planning strategy for the opportunity area and has a significant knock on impact in relation to aspirations for housing delivery and commercial intensification. (d) The 2021 London Plan retains indicative targets of 25,500 new homes and 65,000 new jobs in the Old Oak and Park Royal Opportunity Area over the 20 year plan period. The OPDC's submission draft Local Plan (2016) targeted 20,100 new homes. This figure has now been reduced to 19,850 in the latest draft Local Plan. (e) Job targets have similarly been reduced from 40,400 to 36,350 reflecting a greater proportion of industrial jobs and their lower job densities. (f) This means that there is a need to find alternative sites for housing and employment uses so that OPDC can maintain general conformity and maximise the delivery of housing and jobs in line with the London Plan targets. (g) The Site has potential to close the gap between the London Plan and OPDC's original housing targets and the less ambitious ones now proposed. The Site will help to ensure that the OOC opportunity area fully realizes its growth and regeneration potential.	No change proposed. The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with the greatest access to a sustainable travel modes and contiguous with existing areas of non SIL land or land proposed for SIL release. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs. In the particular case of the 100 Twyford Abbey Road site, this has been identified as an existing site in the West London Waste Plan (WLWP) since it was adopted in 2015 and we note from your response that the site remains in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use. The GLA have signed a Statement of Common Ground that confirms that the OPDC Local Plan is in general conformity with the 2021 London Plan.	N	

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131	Land owner	James	Kon	Wards of London Properites	5		Places		P4		<p>(h) The SIL designation unnecessarily constrains the development potential of the Site and a design solution appropriate to the Site's location and consistent with policy is feasible, as demonstrated by the Allies & Morrison ("A&M") masterplan.</p> <p>(i) The Site is suitable and available for an economically viable residential led, mixed-use development and the potential for the Site to be brought forward during the first 5 years of the plan period is achievable.</p> <p>See below: Part 2: REQUEST FOR REMOVAL OF SIL DESIGNATION</p>	<p>No change proposed. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. This includes ensuring general conformity with the 2021 London Plan ten-year housing target and Opportunity Area housing target.</p> <p>The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with good public transport access and contiguous with areas already released or proposed to be released from SIL. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs.</p> <p>In the particular case of the 100 Twyford Abbey Road site, this has been identified as an existing site in the West London Waste Plan (WLWP) since it was adopted in 2015 and we note from your response that the site remains in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the London Plan policy S19 that states existing waste sites should be safeguarded and retained in waste management use.</p> <p>Housing development sites are identified as available in the Development Capacity Study (DCS) Update based on the methodology set out in the DCS. The referenced sites have not been proposed to be modified in response to the Inspector's Interim Findings and their development proposals remain consistent with the submission Local Plan. Regardless, they are considered to be available during the plan period. The DCS sets out approaches to overcome constraints to support their development. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>OPDC considers that these modifications have resulted in OPDC's Local Plan demonstrating it can meet the London Plan housing targets.</p> <p>The Mayor has confirmed the Local Plan is in general conformity. This is set out in a Statement of Common Ground and the Mayor's consultation response.</p>	N	
131	Land owner	James	Kon	Wards of London Properites	6		General	General			<p>WLP would welcome a site visit and landowner engagement with the OPDC following submission of these representations should the OPDC deem this appropriate.</p>	Noted	N	

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131	Land owner	James	Kon	Wards of London Properities	7		Places		P4		<p>THE SITE</p> <p>The Site is 1.1 hectares and is located to the immediate west of the Old Oak Common opportunity area, within Park Royals SIL. The Site is bounded by Rainsford Road to the west and Twyford Abbey Road to the north. The Grand Union Canal is located to the north of the Site.</p> <p>The Site is adjacent to the LB of Brent boundary. Established residential communities are located immediately to the west of the Site along Rainsford Road and to the north of the Site along Twyford Abbey Road. To the south of the Site there is a business park occupied primarily for warehousing and storage purposes.</p> <p>We have identified the Site within the location plan below, edged in red (Figure 1). The Site is operated by Bridgemarts Ltd and is trading as Gowing & Pursey. The Site is currently operated as a waste transfer station receiving predominantly construction, demolition and excavation waste.</p> <p>The Site is a safeguarded site in the West London Waste Plan by virtue of its existing use. However, the Site is not one of the eight sites within that Plan allocated to meet West London's apportionment need going forwards.</p> <p>The Site is not suitable for heavy industrial intensification because of its proximity to residential areas.</p>	<p>No change proposed. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. The WLWP was adopted in 2015 and the 100 Twyford Abbey Road site was identified as an existing site at this time. We note from response that the site is currently in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'.</p> <p>OPDC Local Plan policy EU6 is also in general conformity with the 2021 London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use.</p> <p>Notwithstanding this and with regards to industrial intensification, evidence in the Park Royal Intensification Study demonstrates that a range of intensification types and sites are viable in Park Royal. Even though the site is near to housing, it is also surrounded by designated SIL on all sides with the exception of a small interface with non SIL land. Also given the size of your site (1.1ha), in line with our evidence, this is a site that could potentially viable for industrial intensification.</p>	N	
131	Land owner	James	Kon	Wards of London Properities	8		Places		P4		<p>PART 1: CORRECTIONS REQUIRED TO OPDC POST SUBMISSION MODIFIED DRAFT LOCAL PLAN</p> <p>There was no mention of the Site at all in the early versions of the draft Local Plan, including the version submitted to the Secretary of State for examination.</p> <p>By contrast, the waste transfer station which lies to the north of the Site on Abbey Road (see Figure 1, site edged in blue) is specifically mentioned in text stating that "the Twyford Waste and Recycling Centre...is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (WLWP) 2016 (see Policy EU6). Following queries raised by the Inspector in 2018 - 2019 (see question 16 and the OPDC's response), the Main Modifications draft has made the following changes:</p> <ol style="list-style-type: none"> 1. The inclusion of the Site as a WLWP site in the proposals map (and therefore its inclusion within Policy EU6); 2. The inclusion of text in Policy P4 "safeguarding Twyford Waste Transfer Station Site in accordance with the West London Waste Plan". As this does not refer to the waste transfer site to the north of the Site (edged blue on Figure 1), it is assumed that this must refer to the Site. <p>We are concerned that the terminology relating to both the Site and the waste transfer site to the north in the latest draft Local Plan is confusing.</p> <p>To ensure consistency with the WLWP and to avoid confusion the following amendments to the draft Local Plan are therefore requested:</p> <ol style="list-style-type: none"> 1. Policy P4 must refer to "100 Twyford Abbey Road" in relation to the Site instead of the "Twyford Waste Transfer Station". 2. The supporting text at paragraph 4.58 should refer to the "Twyford Waste Transfer Station" instead of the "Twyford Waste and Recycling Centre", as this is consistent with the WLWP. 3. The following text should be inserted in paragraph 4.58: "100 Twyford Abbey Road is also a safeguarded site. If 100 Twyford Abbey Road were redeveloped for a non-waste use then compensatory provision would need to be made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6". 	<p>Change proposed. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. The WLWP was adopted in 2015 and the 100 Twyford Abbey Road site was identified as an existing site at this time. We note from your response that the site is currently in waste use. Policy P4 correctly refers to the Twyford Waste Transfer Station identified as an allocated site in the WLWP. It is proposed that the supporting text is amended to ensure references to this site are consistent. If a proposal for a non waste use came forward then this will be assessed against relevant national, 2021 London Plan and Local Plan policies, including the requirement for compensatory provision.</p>	Y	131/8

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131	Land owner	James	Kon	Wards of London Properites	9		Strategic Policies		SP10		<p>PART 2: REQUEST FOR REMOVAL OF SIL DESIGNATION</p> <p>As identified above, the recommendations in the Inspector's interim findings and the decision to retain key strategic sites in SIL will result in a significant loss of housing capacity, and also a reduction in employment capacity.</p> <p>As a result of this, the OPDC's Industrial Land Review Addendum (ILRA) (February 2021) considers a revised approach to SIL designations and makes recommendations for modifications to the SIL boundary.</p> <p>Outputs from the ILRA have informed the OPDC's Development Capacity Study Update (February 2021), which identifies sites and broad locations with potential for development over the plan period and assesses the development potential of sites and broad locations.</p> <p>We have drawn on these two documents to assess the suitability, availability and achievability of the Site and to demonstrate why the removal of the proposed Strategic Industrial Land (SIL) designation for the Site should be supported, for the following reasons:</p> <p>Potential to contribute to housing capacity</p> <p>The 2021 London Plan policy H1(B)(1)(c) requires local planning authorities to enable the delivery of housing capacities identified in Opportunity Areas and policy H1(B)(2) also requires the need to optimize the potential for housing delivery on all suitable and available brownfield sites.</p> <p>As demonstrated by the A&M masterplan feasibility solution, the Site, a brownfield site, has the potential to deliver 315 new homes through sensitive redevelopment of the Site. This number would go a significant way towards addressing the capacity gap identified in the OPDC's Development Capacity Study and, for that reason alone, must be given serious consideration. The proposed housing densities (802 habitable rooms per hectare/286 dwellings per hectare) are appropriate given the location of this 'transitional' site.</p> <p>It is important to note that eight of the sites in the OPDC's Development Capacity Study identified as having potential for housing development and economic uses (Cumberland Business Park, Old Oak Common Lane sites (north), Big Yellow Storage (Scrubs Lane), Algerian Embassy, 3 Portal Way, Big Yellow Storage (Wales Farm Road), Ursula Lapp Estate) are not in fact available for development because the landowner has not yet expressed an interest in the development of the relevant site, as acknowledged in that study. In the event these sites do not come forward, the projected housing capacity for the plan period would be reduced by a further 1350 and the number of jobs available would be reduced by a further 1390.</p> <p>Additional SIL release is therefore required on sites genuinely available so that OPDC can maintain general conformity and maximise the delivery of housing in line with the London Plan targets, and in line with Policies H1 and SP4 of the draft Local Plan which state that the OPDC will provide "new homes that help to meet a local and London-wide need".</p>	<p>No change proposed. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. This includes ensuring general conformity with the 2021 London Plan ten-year housing target and Opportunity Area housing target.</p> <p>The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with good public transport access and contiguous with areas already released or proposed to be released from SIL. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs.</p> <p>In the particular case of the 100 Twyford Abbey Road site, this has been identified as an existing site in the West London Waste Plan (WLWP) since it was adopted in 2015 and we note from your response that the site remains in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the London Plan policy S19 that states existing waste sites should be safeguarded and retained in waste management use.</p> <p>Housing development sites are identified as available in the Development Capacity Study (DCS) Update based on the methodology set out in the DCS. The referenced sites have not been proposed to be modified in response to the Inspector's Interim Findings and their development proposals remain consistent with the submission Local Plan. Regardless, they are considered to be available during the plan period. The DCS sets out approaches to overcome constraints to support their development. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>OPDC considers that these modifications have resulted in OPDC's Local Plan demonstrating it can meet the London Plan housing targets.</p> <p>The Mayor has confirmed the Local Plan is in general conformity. This is set out in a Statement of Common Ground and the Mayor's consultation response.</p>	N	

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131	Land owner	James	Kon	Wards of London Properties	10		Strategic Policies		SP10		<p>Potential to contribute to jobs capacity</p> <p>As noted above, there is also a shortfall in jobs capacity when compared with the London Plan and the original draft OPDC Local Plan submitted to the Secretary of State.</p> <p>The scheme proposed by A&M has the capacity to contribute 2,656 sqm of commercial floorspace, representing approximately 225 more jobs to the area and therefore increases employment numbers (currently approximately 50 at the Site) and employment densities and supports the delivery of new jobs in line with policy SP5(a).</p>	<p>No change proposed. London Plan Opportunity Area jobs targets are indicative. OPDC's Local Plan provides guidance for supporting job creation and opportunities to seek to meet this target over the long term lifetime of the development.</p> <p>100 Twyford Abbey Road was not identified for release from SIL as part of the Industrial Land Review assessment. The GLA have signed a Statement of Common Ground that confirms that the OPDC Local Plan is in general conformity with the 2021 London Plan. Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs. In this particular case, the site has been identified as an existing site in the West London Waste Plan (WLWP) since it was adopted in 2015 and we note from your response that the site remains in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. Therefore, all of the sites have a role to play and cumulatively help ensure west London can address its waste needs. Irrespective of whether the site can increase capacity, existing capacity that can be achieved on site can contribute towards meeting waste needs. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use.</p> <p>Even though the site is near to housing, it is also surrounded by designated SIL on all sides with the exception of a small interface with non SIL land. Therefore, this may result in conflict with new incoming residential uses. The site does not benefit from planning permission and would not contribute to the Old Oak regeneration area. There is also 1 local heritage listing located within the site boundary.</p>	N	

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131	Land owner	James	Kon	Wards of London Properites	11		Places		P4		<p>Potential impact on SIL</p> <p>It is noted that draft Policy E1 seeks to protect the functioning, attractiveness and competitiveness of the Strategic Industrial Location (SIL) and its ability to support employment and economic functions. The policy goes on to state that this should be done by providing SIL compliant broad industrial type uses, by increasing or at least maintaining employment densities (see above, "Potential to contribute to jobs capacity") and that there should be no net loss of industrial floorspace unless this is required to make a more efficient use of space and provided this would not have a significant impact on the overall amount of industrial floorspace in the SIL.</p> <p>The Site is only 1.1 hectares and therefore does not make a strategic contribution to the Park Royal SIL which covers an area of 1,200 acres.</p> <p>The Site is located at the western extremity of the Opportunity Area and Park Royal SIL; it is not a key integrated site within the SIL. The Site could therefore be successfully removed from the edge of the SIL without undermining the function of other SIL activities. The Site's removal from the Park Royal SIL would not compromise the integrity or delivery of the remaining SIL land and would not compromise the successful operation of neighbouring industrial uses within the Park Royal SIL.</p> <p>The Arup report indicates at paragraph 2.5 that the contribution of the Site in terms of the annual waste throughput is not significant at the Greater London regional level and sub-regional level.</p> <p>Arup also identify (paragraph 2.3) that the Site has never operated at capacity. The Site has a maximum permitted annual throughput of 350,000 tonnes of waste. The annual waste throughputs for the Site for the period 2016-2020 have been significantly lower in comparison to its permitted annual capacity (which is similar to comparative sites). The highest annual waste received was in 2016 when 124,610 tonnes of waste was received at the Site. Arup identify that the potential to significantly increase waste throughput at the Site beyond the five-year maximum is considered unlikely as this would require additional waste processing lines to extract and store more recyclables and circulation areas for mobile plant and operatives which, in turn, would require additional operation space at the Site.</p> <p>Furthermore, the potential for intensification beyond the Site's permitted annual throughput is very limited by virtue of the Site's location close to neighbouring residential areas.</p>	<p>No change proposed. The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with the greatest access to a sustainable travel modes and contiguous with existing areas of non SIL land or land proposed for SIL release. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. The GLA have signed a Statement of Common Ground that confirms that the OPDC Local Plan is in general conformity with the 2021 London Plan.</p> <p>Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs. In the particular case of the 100 Twyford Abbey Road, the site is surrounded by designated SIL on all sides with the exception of a small interface with non SIL land. Therefore consideration would need to be given to potential impacts on neighbouring uses. The site has been identified as an existing site in the West London Waste Plan (WLWP) since it was adopted in 2015 and we note from your response that the site remains in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. Therefore, all of the sites have a role to play and cumulatively help ensure west London can address its waste needs. Irrespective of whether the site can increase capacity, existing capacity that can be achieved on site can contribute towards meeting waste needs. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use.</p>	N	

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131	Land owner	James	Kon	Wards of London Properties	12		Places		P4		<p>Site suitability</p> <p>The location of the Site and its proximity to residential properties lends itself to act as a transition zone between the substantial residential uses to the north and west of the Site and the industrial activities to the east and south of the Site in the remaining SIL (see A&M's schematic masterplan, page 1 "A moment of transition").</p> <p>The land uses (residential/commercial) and the layout proposed by A&M are complimentary to both the residential properties and the industrial uses that flank the Site to the north and east.</p> <p>There are no physical limitations associated with the Site or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination that cannot be successfully mitigated. There is no potential adverse impact on landscape features, nature or heritage conservation. There is a likely market attractiveness for the type of development proposed.</p> <p>As can be seen from the A&M design led masterplan approach, the Site is large enough that new open space can be provided on site.</p>	<p>No change proposed. The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with the greatest access to a sustainable travel modes and contiguous with existing areas of non SIL land or land proposed for SIL release. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. The GLA have signed a Statement of Common Ground that confirms that the OPDC Local Plan is in general conformity with the 2021 London Plan.</p> <p>Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs. In this particular case, the site has been identified as an existing site in the West London Waste Plan (WLWP) since it was adopted in 2015 and we note from your response that the site remains in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. Therefore, all of the sites have a role to play and cumulatively help ensure west London can address its waste needs. Irrespective of whether the site can increase capacity, existing capacity that can be achieved on site can contribute towards meeting waste needs. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use.</p> <p>Even though the site is near to housing, it is also surrounded by designated SIL on all sides with the exception of a small interface with non SIL land. Therefore, this may result in conflict with new incoming residential uses. The site does not benefit from planning permission and would not contribute to the Old Oak regeneration area. There is also 1 local heritage listing located within the site boundary.</p>	N	

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131	Land owner	James	Kon	Wards of London Properites	13		Places		P4		<p>Site accessibility A key aim of the OPDC Local Plan, and national planning policy, is to deliver sustainable development. This is in part achieved by the accessibility of a development proposal, particularly one for residential uses, to a good range of everyday services and facilities. These should be accessed by, in order of preference, walking, cycling, and public transport.</p> <p>The Site is surrounded by a comprehensive pedestrian infrastructure providing direct links to a range of everyday services and facilities within a 10 minute walk including a local primary school, Central Middlesex Hospital, and numerous employment sites. Cyclists are catered for by a bus/cycle lane directly outside the Site leading directly to the off-carriageway cycle facilities on Abbey Road to the east, enabling access to a wider range of employment, education, and retail facilities within a short 20 minutes cycle. The Site's location directly opposite the Grand Union Canal, also ensures that attractive, direct, and traffic free walking, and potentially cycle opportunities can also be facilitated by way of minor enhancements in the future.</p> <p>For longer distance journeys, a minimum of 6 buses per hour serve the bus stops directly adjacent to the Site, providing fast and direct services to London Underground and Overground services on the Piccadilly Line (at Alperton) and the Bakerloo Line (at Harlesden) for direct connections to central London.</p> <p>While a number of car parking spaces are likely to be included in any planning application for the Site (particularly for blue badge holders, and with electric charging facilities), there would be opportunities to further enhance walking and cycling opportunities around the Site and to provide a car club scheme given the proximity of the Site to both residential and commercial uses. Any future development would also be accompanied by a large number of safe and secure cycle parking spaces, alongside a Travel Plan, to further promote active travel opportunities, further reducing the reliance on private vehicles.</p>	<p>No change proposed. The Industrial Land Review Addendum assessment covers a range of criteria including prioritising sites sequentially with the greatest access to sustainable travel modes. This sequential process did not result in the 100 Twyford Abbey Road site being identified as there were sites with better access to public transport which were deliverable and could ensure that OPDC continued to meet its mayoral housing targets.</p>	N	
131	Land owner	James	Kon	Wards of London Properites	14		Strategic Policies		SP10		<p>Site availability and achievability The Site is in the single ownership of WLP and does not require further land assembly so its delivery is straightforward. The Site is anticipated to come forward in the first 5 years of the local plan.</p>	<p>No change proposed. The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with the greatest access to a sustainable travel modes and contiguous with existing areas of non SIL land or land proposed for SIL release. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. The GLA have signed a Statement of Common Ground that confirms that the OPDC Local Plan is in general conformity with the 2021 London Plan. Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs.</p>	N	

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131	Land owner	James	Kon	Wards of London Properties	15		Strategic Policies		SP10		<p>Proposed masterplan</p> <p>A&M have prepared a design solution to maximize the potential of the Site. Their masterplan seeks to optimise housing density through a design-led approach that responds to the Site's context and capacity for change and growth. This is one feasible option which could be explored with OPDC in more detail in pre-application discussions.</p> <p>The proposed masterplan has the potential to deliver 315 residential units, 2,656 sq m of commercial floorspace and approximately 225 jobs. This means that the homes and jobs targets of the Plan could be higher and more closely aligned to the OPDC's original targets.</p> <p>Appropriate heights and massing provide a sense of enclosure to the development whilst responding to existing residential areas to the north and west.</p>	<p>No change proposed. OPDC do not consider it necessary or appropriate for this site to be released from SIL. 100 Twyford Abbey Road was not identified for release from SIL as part of the Industrial Land Review assessment. The GLA have signed a Statement of Common Ground that confirms that the OPDC Local Plan is in general conformity with the London Plan.</p> <p>Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs. In this particular case, the site has been identified as an existing site in the West London Waste Plan (WLWP) since it was adopted in 2015 and we note from your response that the site remains in waste use. Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. Therefore, all of the sites have a role to play and cumulatively help ensure west London can address its waste needs. Irrespective of whether the site can increase capacity, existing capacity that can be achieved on site can contribute towards meeting waste needs. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the London Plan policy S19 that states existing waste sites should be safeguarded and retained in waste management use.</p> <p>Even though the site is near to housing, it is also surrounded by designated SIL on all sides with the exception of a small interface with non SIL land. Therefore, this may result in conflict with new incoming residential uses. The site does not benefit from planning permission and would not contribute to the Old Oak regeneration area. There is also 1 local heritage listing located within the site boundary.</p>	N	

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131	Land owner	James	Kon	Wards of London Properities	16		Places		P4		<p>Compensatory capacity</p> <p>As highlighted in the Arup report (section 4) the redevelopment of waste management sites for non-waste uses is not prohibited by planning policy. However, planning policy does seek to preserve waste management capacity, requiring any capacity lost to other types of development to be replaced through compensatory provision. Therefore any SIL release and subsequent redevelopment of the Site would be subject to compensatory requirements which would result in no net loss of waste facility floorspace.</p> <p>OPDC policy requirements are that site provision should be made in the most appropriate location in a sequential manner:</p> <p>(a) within the OPDC area; or</p> <p>(b) within the relevant waste authority area based on where the lost site is; or</p> <p>(c) within Greater London.</p> <p>As Arup conclude, in relation to the Site it is likely that the relevant waste authority area would be interpreted as the London Borough of Brent and then the area of the West London Waste Authority.</p> <p>Arup have carried out a detailed analysis of eight waste sites with similar waste management operations to those at the Site to assess if these sites can provide sufficient capacity to compensate for the loss of the Site. Seven of these waste sites are located within the geographic area of the West London Waste Authority (WLWA), and one within the North London Waste Authority (NLWA) area in the London Borough of Barnet. No allocated sites in the WLWP have been included in the detailed analysis undertaken. Arup have confirmed that all eight sites are still trading.</p> <p>Arup's analysis demonstrates that based on both the maximum permitted throughput of the Site of 350,000 tonnes/annum, and its adjusted maximum throughput of 130,000 tonnes, there is more than sufficient waste throughput capacity (as adjusted) in the WLWA area to compensate for the loss of the Site.</p> <p>In section 4.7 of their Report, Arup identify that alternative, compensatory provision could also be delivered by providing space within a new developed site for establishing a circular economy hub, which would be at, or above, the 'recycling' level of the waste hierarchy of the Site. This would provide an opportunity to reduce carbon emissions related to waste and create more employment and social value in the local area responding to the planning policies of the GLA and OPDC.</p>	<p>No change proposed. The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. Policy EU6 is also in general conformity with the 2021 London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use. 100 Twyford Abbey Road site has been identified as an existing site in the WLWP since it was adopted in 2015. Paragraph 6.70 (MM/PS2/OPDC/EU6/1) states that OPDC will work with the host boroughs and other waste planning authorities covered by the WLWP to adopt a new WLWP. If a proposal for a non waste use came forward then this will be assessed against relevant national, London Plan and Local Plan policies, including the requirement for compensatory provision. Notwithstanding this, the Local Plan is proposing to retain this site within the Strategic Industrial Location, which is protected for industrial uses.</p>	N	
131	Land owner	James	Kon	Wards of London Properities	17		Places		P4		<p>Conclusion</p> <p>Based on the reasons set out above, we consider that the release of the Site from the SIL designation is justified and indeed supported by policy.</p> <p>The Site is available now, offers a suitable location for development and is achievable with a realistic prospect that housing and jobs will be delivered on the site within 5 years.</p> <p>The development of the Site as proposed will help to recover some of the housing capacity and in excess of 200 jobs lost from Old Oak North within the plan period.</p>	<p>No change proposed. The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with the greatest access to a sustainable travel modes and contiguous with existing areas of non SIL land or land proposed for SIL release. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. The GLA have signed a Statement of Common Ground that confirms that the OPDC Local Plan is in general conformity with the 2021 London Plan. Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs.</p>	N	

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132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	1		General	Delay or withdraw the plan			<p>These are some of the reasons why we residents argue that this March 2021 version of the Draft Plan is not 'sound' and will not lead to a successful and sustainable new Old Oak.</p> <p>Given that Old Oak Common station will not be open for a decade and that the needs of London have changed post-pandemic and Brexit, we think a fresh start should be made on a better Plan that works for the needs of Londoners and for Old Oak Common residents, old and new. Where relevant the relevant 'major modification' is referenced so that your comments cannot be set aside as not meeting the required process of commenting on such modifications.</p> <p>As you know, Wells House Road and other Old Oak/Park Royal residents are suffering enormous hardships and negative impacts because of the construction of HS2. We will live through over a decade in the centre of the largest construction site in the UK.</p>	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	2		Design		D3, D4		<p>We object to high-rise buildings being constructed close to our homes, particularly in view of the fact that there is no evidence that this level of density of housing and office blocks are still required post-pandemic, nor is high-rise living popular with Londoners.</p>	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The principle for delivering high quality high density mixed use development in areas outside of SIL has not been modified as part of the proposed main modifications. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	

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132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	3		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • 2021 with a continuing pandemic is not the time to fix in place a Local Plan for one of the last large areas of largely undeveloped land in London. Much is changing, in London's population trends, commuting patterns, and the type of housing in which people want to live. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station. The proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision that will support the delivery of sustainable high quality development across the OPDC area.</p> <p>The proposed modifications are considered to be in general conformity with the 2021 London Plan.</p> <p>Local Plans are required to be reviewed within 5-years of adoption. This will enable OPDC to reflect the updated Government requirements for producing Local Plans, updates to the NPPF, reflect on 2021 Census information and to incorporate any potential requirements to support the recovery from Covid. The Local Plan already includes elements that will support the recovery from Covid including providing flexibility for land uses to respond to changes in the market, delivering jobs, homes at a range of affordabilities and typologies, delivering 30% of development as public open space, securing high quality design, recognising the need for development to support health and well-being and reducing the need to travel.</p> <p>Noted. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. HS2's environmental controls are set out in HS2's Environmental Minimum Requirements and associated undertakings and assurances that were made by HS2 Ltd during the parliamentary stage of the High Speed Rail (London – West Midlands) Act 2017 which dealt with mitigation during construction. OPDC is working closely with HS2, TfL and the highways authorities to address these impacts in their respective roles.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	4		General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> • The changes made to the 2018 version of the Local Plan are not small ones. Entirely new locations have been earmarked for high density and high rise housing. With OPDC claiming in its consultation material that 'most of the Plan remains the same' many local people have not caught up with the fact that proposals dating from 2018 are being substantially altered. 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	

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132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	5	MM/PS2/OPDC/P9/1	General	Extent of changes			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> New plans for Channel Gate with high density high rise inserted into existing low rise residential areas have been inadequately consulted on and should not be introduced via a 'modification' at this late stage MM/PS2/OPDC/P9/1 	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	6	MM/PS2/OPDC/SP/25 MM/PS2/OPDC/T/1	Transport		T5,T6		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> OPDC continues to say that these locations for high density housing will be 'well connected'. In many cases this is not true. With no new Overground or Underground stations, as originally proposed, these locations are poorly served by public transport. Extra buses on road heavily congested are not much help. MM/PS2/OPDC/SP/25 and MM/PS2/OPDC/T/1 	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on controlling car parking levels, reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. These improvements are reflected in the public transport PTAL scoring of the area, which improves significantly between current and future years, as shown in Figures 7.10 and 7.11.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	7	Major Modification Figure/PS2/OPDC/PM2	Transport				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The modified Plan does nothing to join up the existing residential areas on the west and east side of the Scrubs, for the next 20 years. We are left with east-west connections through Harlesden or south of the Scrubs at Du Cane Road. Major Modification Figure/PS2/OPDC/PM2 	<p>No change proposed. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	8		Transport		T4		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High density housing which is 'car-free' does not mean 'vehicle free'. This Plan does not reflect the rapid changes taking place on online sales and delivery traffic. Wells House Road, Midland Terrace, Shaftesbury Gardens and the Island Triangle are already experiencing residential streets filled with Oaklands workers and visitors. Once that high-rise complex is open, residents will be car owners, like it or not, and will use our streets as their parking lots. They will also increase congestion and traffic pollution in the area. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, the Local Plan includes policies to reduce trips by freight, servicing and delivery vehicles. Policy T7 requires developers to demonstrate how delivery and servicing requirements will be managed, including use of consolidation centres, moving deliveries to outside of peak hours, and exploring the use of rail and water transport. Policy T6 prevents new residents from applying for parking permits for CPZs in neighbouring streets.</p>	N	

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132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	9		Housing				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> High rise housing is not what many people want or need in 2021 onwards, given a cladding scandal and the risks of further future lockdowns. Lifts and social distancing do not combine well. We already see that the local high-rises have been turned into student living and foreign investment ownerships. This is NOT homes for Londoners. 	<p>No change proposed.</p> <p>There is a clear need for the development industry to learn from the Grenfell disaster and ensure that future developments are designed, maintained and managed to the highest standards to ensure the safety of residents. It has also become clear that poorly managed lower rise buildings can also be at risk and OPDC will ensure that all new developments, whether high or lower rise, will be built and operated to the highest standards of building construction, management and safety.</p> <p>The consideration of fire safety measures during the determination of planning applications is carried out through the recently established Planning Gateway One process and complements the Building Control process. Planning Gateway One requires applicants to submit a fire statement for proposals of 7 or more storeys, setting out fire safety considerations and requires local planning authorities to consult the Health and Safety Executive on the proposal. In addition, Local Plan Policy D3vi requires developments to maximise fire safety in accordance with the latest Building Regulations and 2021 London Plan policies (D12) which provides guidance to deliver the highest standards of fire safety. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment.</p> <p>Policy SP3c requires proposals design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles. Policy SP9aiv requires proposals to deliver buildings, public realm and infrastructure of the highest design quality and architecture, that delivers a safe and secure environment. The Local Plan provides for a full range of housing types.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	10		General	Delay or withdraw the plan			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> We would ask for the plan to plan to be held back until we see the success of Oaklands and high rises in North Acton before blighting the area with further towers. We have evidence that the new blocks in North Acton as left mainly empty. 	<p>No change proposed. As a local planning authority, OPDC has a duty to produce a Local Plan as expeditiously as is feasible. This is emphasised by MHCLG's Chief Planner within the MHCLG's 1 October 2020 Planning Newsletter in which MHCLG strongly encourages local authorities to continue in the adoption of Local Plans while the changes to the planning system are implemented. This is especially true as OPDC has a number of planning applications to determine in the short to medium term and well in advance of the opening of the Old Oak Common station.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity.</p>	N	

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132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	11	MM/PS2/OPDC/SP/19 MM/PS2/OPDC/SP/14 6a	Town Centre and Community Uses				<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> The 2018 Draft included a 'major town centre' at Old Oak North on the Cargiant Land. This 2021 version refers at various points to 'parts of a major town centre'. The location of Channel Gate for 'major town centre uses' is not convincing. North Acton is now largely redeveloped but attracts only fast food and chain café outlets aimed at students and a transient population. MM/PS2/OPDC/SP/19 and MM/PS2/OPDC/SP/14 6a 	<p>No change proposed. The future major town centre at Old Oak is not proposed to be delivered at an single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>Old Oak North is now proposed to be Strategic Industrial Location and it is not appropriate for this location to continue to comprise of part of Old Oak Major Town Centre. This part of the town centre has instead been flipped into Channel Gate. Channel Gate is a site of over 20ha in size, with the potential for a minimum of 3,100 new homes. It is comparable in scale to the land previously designated for mixed use development at Old Oak North, and is considered to be of a sufficient scale to play an important part in delivering the Old Oak Major Town Centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The Development Capacity Study Update identifies further development sites within North Acton including 1 Portal Way and Victoria Industrial Estate. These sites alongside Acton Wells East and West will deliver additional town centre activities in North Acton and Acton Wells.</p> <p>Policy P10 provides guidance to manage student housing.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	12		Places		P8		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Specifically, Wells House Road residents object to any highrise buildings being erected on the site to the east of Wells House Road, adjacent to the Old Oak station. HS2 had promised that this would be green space and is still indicating this on their maps. This would black out the light for residents and render gardens unusable. 	<p>No change proposed. The Old Oak Common Station Adjacent Station Development Site was identified as an appropriate location for tall buildings in the submission Local Plan. This is not proposed to be modified.</p> <p>Any proposal for development will be determined using development plan policies and material considerations. Policies include Local Plan and London Plan policies for managing tall buildings and providing appropriate levels of amenity for surrounding areas. Specifically policy P1 requires development to respond appropriately to Wells House Road. Local Plan policy SP9 also requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>OPDC's proposed modifications also propose the delivery of the Old Oak South Local Park to the north of the Old Oak Common Station Adjacent Station Development Site.</p>	N	

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132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	13		General	Community cohesion and character			<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> Overall, these plans are contrary to any desire for community cohesion and out of character with West London. 	<p>No change proposed.</p> <p>Supporting community cohesion is a critical cross cutting requirement of OPDC's Local Plan Spatial Vision and is embedded in a series of policies to ensure that the needs of existing and new communities are met; that development is shaped by community engagement and that development delivers benefits for local communities. A key policy is SP4 which requires developments to promote lifetime neighbourhoods, social cohesion and integrate new and existing communities. This policy sets out OPDC's requirement for 50% affordable housing. Policy TCC3 also sets out the social infrastructure needs for the area including schools, health facilities and community spaces.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p>	N	
132	Community / interest group	Wells House Road	Residents Association	Wells House Road Residents Association	14		Environment and Utilities		EU4, EU5		<p>These are the key points we wish to make:</p> <ul style="list-style-type: none"> If these plans go ahead, provisions should be made for local homes to receive noise insulation on all doors and windows and air filters to counter a further decade of construction impacts. 	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. Nonetheless, Policy EU5 (a), 6.61 requires development to demonstrate how the impacts of noise and vibration on health and quality of life during construction and occupation will be modelled and mitigated.</p>	N	
133	Local Authority	Andrew	Barry-Purssell	West London Alliance	1		Places		P7		<p>Our overriding concern is that the way in which the main modifications describe both the WLO and the OOCL station does not properly reflect the stage the work by Transport for London and the WLA to develop the business case for the project has reached. A Strategic Outline Business Case (SOBC) was published in June 2019 and given the strength of the case at that stage the decision was taken to carry out further work. I attach an updated SOBC which describes the work done to date, which includes studies on potential economic benefits and on funding. This work is continuing with consultants appointed to carry out engineering/design work, including for the OOCL station and the Acton Wells junction.</p>	<p>Noted. These concerns have been addressed in the following responses (ref. 133/5-10).</p>	N	
133	Local Authority	Andrew	Barry-Purssell	West London Alliance	2		Strategic Policies		SP7		<p>In addition, you will be aware that the WLO and Overground interchange at Old Oak Common are included in the "indicative list of transport schemes" in the now formally published London Plan (table 10.1). It is therefore also supported by London Plan Policy T1, which states, inter alia, that development plans should support, and development proposals facilitate, delivery of the projects in table 10.1.</p>	<p>Noted. These concerns have been addressed in the following responses (ref. 133/5-10).</p>	N	

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133	Local Authority	Andrew	Barry-Purcell	West London Alliance	3		Places		P7		At this stage of the project, we reserve our position regarding the contribution the WLO (and OOCL station as part of this) might make to delivering the quantum of development envisaged in the draft Local Plan or increments of growth above this. This is something that will have to be revisited as further work is done on the WLO, issues like service levels are clarified and further work is done on scheme benefits. Changing quanta, type and spatial distribution of development on the ground may also affect this judgement going forward and we have discussed with you the need to keep this issue under review.	Noted. These concerns have been addressed in the following responses (ref. 133/5-10).	N	
133	Local Authority	Andrew	Barry-Purcell	West London Alliance	4		Strategic Policies		SP7		We are clear, however, that the way the WLO and OOCL station are described in the modified plan implies a degree of uncertainty about the project and its potential benefits that are unmerited given the progress made to date on business case development and the support for the project in the London Plan. This position informs the changes we are proposing to the proposed modifications:	Noted. These concerns have been addressed in the following responses (ref. 133/5-10).	N	
133	Local Authority	Andrew	Barry-Purcell	West London Alliance	5	MM/PS2/OPDC/P7/4	Strategic policies		P7 m)		Proposed amendment: m) Safeguarding for and if relevant and appropriate, contribute to and / or deliver the potential proposed Old Oak Common Lane Station and land for the delivery of the West London Orbital Line station and services within Acton Wells. Reason: It will only be "appropriate" to seek contributions from developers where the tests in regulation 122 of the CIL Regulations 2010 can be met. This includes a direct link to the development so includes relevance. "Relevant" here is otiose. The second suggested amendment better reflects the stage the project has reached and formal recognition of the WLO/Old Oak Common Overground interchange in the London Plan.	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project.	Y	133/5
133	Local Authority	Andrew	Barry-Purcell	West London Alliance	6	MINOR/2/P7/12	Strategic policies		P7	4.118	Proposed amendment: 4.118 Development proposals within Acton Wells should safeguard land to enable the potential delivery of the West London Orbital Line, which is proposed to may include an interchange with Old Oak Common Lane Station and passenger services making use of running-on the existing Dudding Hill Line. OPDC strongly supports the delivery of the West London Orbital Line and is working with TfL, west London boroughs and other relevant stakeholders to undertake further work to further develop the business case for the scheme proposal, including options for funding. The scheme is formally recognised in the London Plan reviewing feasibility of the scheme and updating the business case. Reason: To better reflect the stage the project has reached and formal recognition of the WLO/Old Oak Common Overground interchange in the London Plan. We have separately flagged the need to update the IDP references relating to the WLO (particularly timing of delivery).	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project.	Y	133/6
133	Local Authority	Andrew	Barry-Purcell	West London Alliance	7	MINOR/2/P7C2/7	Strategic policies		P7C2 b)		Proposed amendment: b) Working positively and proactively with TfL to ensure delivery of a high quality public route between Old Oak South and Acton Wells that: ... ii. is integrated with a potential-proposed new Old Oak Common Lane Station... Reason: Better reflects stage the project has reached. Given publication of an SOBC, further work and formal recognition in the London Plan, "proposed" is more appropriate than the more speculative "potential".	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project.	Y	133/7

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133	Local Authority	Andrew	Barry-Purssell	West London Alliance	8	MINOR/ 2/P7C2/7	Strategic policies		P7C2 d)		Proposed amendment: d) Supporting the delivery of a potential proposed new Old Oak Common Lane London Overground Station to enhance public transport access and as an integral part of the built environment by providing..... Reason: Better reflects stage the project has reached. Given publication of an SOBC, further work and formal recognition in the London Plan, "proposed" is more appropriate than the more speculative "potential".	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project.	Y	133/8
133	Local Authority	Andrew	Barry-Purssell	West London Alliance	9	MM/PS2/OPDC/P7C2/1	Strategic policies		P7C2	4.121	Proposed amendment: 4.121 The potential Old Oak Common Lane Station is a TfL transport requirement, to provide an appropriate interchange between services within Old Oak Common Station and other local services. The Station will need to be designed to support this role. The station is not currently considered to be needed to support the quantum of development envisaged in this plan required to directly support Old Oak's development transport needs ; however, it is identified in the London Plan as a scheme that local plans should support and to support strategic transport needs development should safeguard for and if relevant and appropriate, contribute to and / or deliver the station. Particularly given the station's important strategic function for wider transport connectivity and its strong business case, OPDC strongly supports the delivery of this rail station and will be working proactively with TfL, Network Rail and other relevant stakeholders to secure its delivery. Reason: It is not clear what "development transport needs" means and the first proposed wording is a more accurate (and clearer) statement of the position. It also makes clear that the position may have to be reviewed as work on the WLO and OOCL station proceeds. The second proposed amendment removes an unwarranted purported distinction between "strategic" and other transport needs. Support for the WLO is now a matter of general conformity with London Plan Policy T1, which does not envisage the kind of distinction suggested here and states that schemes identified in table 10.1 (which include the WLO) should be supported in local plans. The third proposed amendment is suggested for the same reason a similar suggestion was made above – "relevant and" is otiose and potentially confusing. The final proposed amendment is a statement of support for delivery of OOCL station.	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project.	Y	133/9
133	Local Authority	Andrew	Barry-Purssell	West London Alliance	10		Strategic policies		P7C2	4.122	Proposed changes consequential on the above, to ensure consistency. Proposed amendment: 4.122 The station is being designed to serve the North London Line Richmond branch and the proposed but there are also proposals for a West London Orbital line route , running from Hounslow to Brent Cross and making use of an the existing Dudding Hill Line, with trains potentially stopping at Old Oak Common Lane Station. This is one of the schemes identified in table 10.1 in the London Plan and supported by its policy T1. Proposals should safeguard for the delivery of any infrastructure associated with this connection and if appropriate, contribute to or otherwise facilitate delivery of the scheme . Applicants should refer to OPDC's IDP for the most up-to-date requirements.	Change proposed. Text has been updated to reflect the updated position and progression of the West London Orbital project.	Y	133/10
133	Local Authority	Andrew	Barry-Purssell	West London Alliance	11		Infrastructure Delivery Plan				For the reasons we have set out, we also do not consider that the references to the WLO in the Infrastructure Delivery Plan published alongside the proposed modifications are correct, and require amendment: (see timetable in reps) • On page 14, the "Phase" column suggests that the WLO (identified as ID TR9) would be "21+ years". This is inconsistent both with the timescale shown in the London Plan ("2020-2030") and the latest indicative timetable for the project	Change proposed. The Infrastructure Delivery Plan has been updated the refer to the WLO within the 0-20 year phase of the Local Plan to reflect the timings in the 2021 London Plan.	Y	133/11

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133	Local Authority	Andrew	Barry-Pursell	West London Alliance	12		Infrastructure Delivery Plan			Appendix B	<p>In Appendix B, the entry for Old Oak Common Lane Station (TR4) should be amended to read (proposed changes in red):</p> <p><u>“The station has been identified by TfL as having a strong business case (with a BCR of 3.1:1), providing an appropriate interchange between services within Old Oak Common Station and other local services. has a strong strategic / regional case but has limited local impact on development capacity within the OPDC area.</u></p> <p>The business case for the station estimates it would support the delivery of 80 additional homes and 800 Full Time Equivalent jobs. As such, <u>it is not currently considered to be needed to support the quantum of development envisaged in the Local Plan and is therefore - it is</u> considered a desirable, rather than necessary, piece of infrastructure. Proposals should safeguard for station delivery. Proposed east-west pedestrian and cycle link (Project TP16) has been assumed to enable future station delivery. The Station would be required to deliver the proposed West London Orbital service, and project costs are likely to form part of the overall WLO delivery.”</p> <p>For the reasons given above, the “Phase” column should refer to “2020-2030” and not “21 years+”.</p>	Change proposed. The Infrastructure Delivery Plan has been updated to reflect the updated position and progression of the West London Orbital project. The phasing of the proposed Old Oak Common Lane station has been updated to within the 0-20 year phase to reflect the timings in the 2021 London Plan.	Y	113/12
133	Local Authority	Andrew	Barry-Pursell	West London Alliance	13		Infrastructure Delivery Plan			Appendix B	<p>In Appendix B the entry for the West London Orbital (TR9) should be amended to read (proposed changes in red):</p> <p>Milestone Indicative date Timetable assessment of alternative service options March to August 2021 Engineering assessment of infrastructure options May to October 2021 Steering Group decision on proceeding to next phase October/November 2021 Further scheme development to identify preferred option November 2021 to Summer 2022 Concept design Autumn 2022 to late 2023 Transport and Works Act Order application submission Early 2024 Transport and Works Act Order consent granted Late 2025 Detailed design Late 2025 to late 2026 Main works construction, testing and commissioning Late 2026 to Spring 2029 Services commence Spring 2029</p> <p>“The WLO project is strongly supported by OPDC, and OPDC is working with partners in the West London Alliance and TfL on developing proposals.</p> <p><u>The project is supported by the London Plan but is at a comparatively early stage of development and currently has no committed funding and. Modelling undertaken in 2017 for the potential proposed Old Oak Common Lane station suggested that the station would have limited impact on capacity required to support growth within OPDC at this stage.</u> As such, <u>it this project is currently</u> considered a desirable, rather than necessary, piece of infrastructure for the purposes of the OPDC Local Plan and IDP. <u>However, there is ongoing work to develop the Business Case for the West London Orbital and the results of this work may mean there will be a need to review and update this item within the IDP accordingly.</u></p> <p>Costs for OOCL Station (TR4) also relate to delivery of the WLO, however further work is required to assess how the <u>WLO would be served by a future proposed</u> OOCL station <u>will be delivered and WLO services accommodated.</u>”</p> <p>Again, the “Phase” column should refer to “2020-2030” and not “21 years+”.</p>	Change proposed. The Infrastructure Delivery Plan has been updated to reflect the updated position and progression of the West London Orbital project. The phasing has been updated to within the 0-20 year phase to reflect the timings in the 2021 London Plan.	Y	113/13

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134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	1		General	Extent of changes			I fully support the comments made by GUA and Old Oak Neighbourhood Forum (OONF) - a community forum within OPDC land and greatly affected by the Draft Local Plan modifications namely :- A. The Plan has changed significantly since 2018.	Noted. Please refer to OPDC's responses to the Grand Union Alliance, St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	2		General	Extent of changes			I fully support the comments made by GUA and Old Oak Neighbourhood Forum (OONF) - a community forum within OPDC land and greatly affected by the Draft Local Plan modifications namely :- B. Consultation on these changes has been inadequate, especially on Channel Gate as a future housing site and 'major town centre'	No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development. The Local Plan previously identified Atlas Junction as a neighbourhood town centre. The proposed modifications continue to identify town centre uses in Channel Gate centred around Atlas Junction as part of a modified Old Oak major town centre. The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	3		General	Support for community group comments			I fully support the comments made by GUA and Old Oak Neighbourhood Forum (OONF) - a community forum within OPDC land and greatly affected by the Draft Local Plan modifications namely :- C. The representations from the Old Oak Neighbourhood Forum are supported.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	

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134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	4	MM/PS2/OPDC/SV1	Spatial Vision		Spatial Vision		1. MM/PS2/OPDC/SV1 Does not give the reason that Old Oak North is to be retained as SIL land. It was the failure of OPDC management (not design) to facilitate Car Giant's move in a timely manner to another area within OPDC. Nothing is said as to how this will not happen again in the future. I feel this will happen again. In particular with the regeneration of Park Royal as there is not a surplus of land / plots available to attract new industry and increase the number of jobs in Park Royal.	No change proposed. Specific reasons and the justification behind retaining specific sites in Old Oak North within the Strategic Industrial Location designation are set out in the Industrial Land Review Addendum (ILRA). The Park Royal Intensification Study, Old Oak North Intensification Study and the Strategic Site Allocations Viability Assessment demonstrate that industrial intensification is deliverable within the OPDC area. With regards to Old Oak North, Cargiant has publicly stated their intention to remain and intensify their site as part of the Local Plan examination process. Key landowners have also signed Statements of Common Ground. Planning applications for sites within Park Royal, including sites identified in the Park Royal Intensification Study, have come forward with proposals to deliver more floorspace. All planning applications would be assessed against relevant policies in the OPDC Local Plan, including those related to Design, Housing (policy H3 supports an appropriate mix of housing types and sizes) and Open space (policy EU1).	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	5	MM/PS2/OPDC/SV/4 MM/PS2/OPDC/SV/5	Spatial Vision		Spatial Vision		2. MM/PS2/OPDC/SV/4 and SV/5 Both points forget to mention Park Royal has a 90% plus occupancy. There is not the capacity to employ another 36,000 jobs without 'management' direction and muscle - which was lacking in the case of Car Giant. Neither does it appear to take on the aspect of Park Royal becoming the biggest warehouse facility and service provider in West London which is now becoming heavily dependant on IT and Robotics, not manpower. Thus reducing the amount of jobs that would be created in the past. It is not a manufacturing hub nowadays - except for food production and even then no account is taken of the smell food production creates and the zoning off such areas, such that their affect on surrounding residential areas is minimised. Mixed developments of industry, commerce and residential have to be treated sensitively.	No change proposed. Over the plan period, the target is to deliver 36,350 new jobs. This target is for the whole OPDC area and covers a range of employment uses, including industrial, office and town centre uses. Policies SP5 and E1 are clear that development within the Strategic Industrial Location should help contribute towards meeting the strategic jobs target - 36,350 new jobs - and the Plan identifies sites that will contribute towards delivering this target. The 2021 London Plan policies on Strategic Industrial Locations (SIL) expects development plans, amongst other things, to protect and intensify the function of SILs and make more efficient use of land. The Local Plan is in general conformity with this by protecting the function of SIL and seeking to intensify sites. All planning applications would be assessed against relevant policies in the OPDC Local Plan, including those related to Design (policy D5 sets out criteria to protect amenity).	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	6	MM/PS2/OPDC/SP/12	Strategic Policies		SP5		3. MM/PS2/OPDC/SP/12 OPDC identify an area of 250,400 M2 floor space available for intensification of SIL and colocation location of industrial activities outside of SIL in the OPDC area. However it fails to mention how this is to happen without any incentives to make it happen. OPDC in the past gave examples of where this could happen in Park Royal, but forgot about the current occupants and owners of the properties, with success full business running in these locations. It could be another Car Giant fiasco. The majority of Park Royal land is privately owned. Ealing are currently looking at a development just off the Hanger Lane Gyrotory for 300 plus apartments above offices which are above industrial units - a colocation mixed development, except it is in the middle of SIL land, overlooking an industrial estate and the six lane highway of the A40, with no green space on or around around the development. That's all without going into the mix of apartments - mainly one and two bedrooms - which may not suit future work patterns. I hope this is not what OPDC call colocation.	No change proposed. The Park Royal Intensification Study, Old Oak North Intensification Study and the Strategic Site Allocations Viability Assessment demonstrate that industrial intensification is deliverable within the OPDC area. With regards to Old Oak North, Cargiant has publicly stated their intention to remain and intensify their site as part of the Local Plan examination process. Other key landowners have also signed Statements of Common Ground. Planning applications for sites within Park Royal, including sites identified in the Park Royal Intensification Study, have come forward with proposals to deliver more floorspace. All planning applications would be assessed against relevant policies in the OPDC Local Plan, including those related to Design, Housing (policy H3 supports an appropriate mix of housing types and sizes) and Open space (policy EU1).	N	

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134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	7	Figure/PS2/OPDC/PM4 Figure/PS2/OPDC/PM15	Strategic Policies		SP6	Policy Map	4. Policy maps Figure/PS2/OPDC/PM4 and PM15 show no heart to Old Oak. PM5 does show all the individual sites, but they are spread out within Old Oak. It is not as originally envisaged at the outset of the Mayors vision in 2015, with a joined up community on either side of the Canal emanating from a central high rise district with a transport hub. It is a lot to take in, in the short period of the Modified Draft Plans' existence.	<p>No change proposed. OPDC considers that the Local Plan has been positively prepared, is effective and results from a justified plan-led process that will deliver sustainable development and achieve the Local Plan's Spatial Vision.</p> <p>The proposed modifications relating to the updated location of portions of the Old Oak Major Town Centre are considered to be justified and effective.</p> <p>Policy SP6 defines the proposed town centre hierarchy. The Local Plan and proposed modifications are clear in the distinction between the Old Oak Major Town Centre and North Acton Neighbourhood Town Centre. Further guidance is provided for portions of the major town centre within the Places Chapter.</p> <p>The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p>	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	8	Figure/PS2/OPDC/2.2	Spatial Vision		Spatial Vision	Spatial Vision diagram	5. Figure/PS2/OPDC/2.2 shows Channel Gate as the Major Town Centre - but it is not at the heart of Old Oak?	<p>No change proposed. The proposed modifications relating to the updated location of portions of the Old Oak Major Town Centre are considered to be justified and effective.</p> <p>Policy SP6 defines the proposed town centre hierarchy. The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre.</p> <p>While these sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre.</p> <p>The proposed Old Oak Major Town Centre is depicted in figures 2.2, 3.7 and 10.3.</p>	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	9	Figure/PS2/OPDC/3.10	Strategic Policies		SP7	Figure 3.10	6. Figure/PS2/OPDC/3.10 shows Channel Gate using the existing roads as the connection roads. Vitoria Road and Old Oak Lane are already congestion areas at peak times and Wormwood Street - the only East to West connection proposed in Old Oak is planned beyond the plan period. The Old Oak Common Lane station is only a potential station at the moment, serving the London Overground Railway and not the underground. All very potentially un-connecting!	<p>No change proposed. The Infrastructure Delivery Plan sets out significant investments in transport to create a well-connected area. These investments include a new station at Old Oak Common and a proposed Old Oak Common Lane Station; upgrades to existing rail stations; a bus strategy for improving and extending bus services and new bus routes; and new and enhanced walking and cycling connections. Other proposals to address congestion include policies on reducing construction traffic and delivery and servicing trips, as well as road and junction capacity upgrades. The Local Plan proposes a number of new east/ west pedestrian and cycle connections across the OPDC area. Old Oak Street is proposed to connect Old Oak Common station, the proposed Old Oak Common Lane station and North Action station. Pedestrians and cyclists can continue east to Scrubs Lane via two new pedestrian/ cycle bridges – one that connects the eastern entrance of Old Oak Common station to the Grand Union Canal, and the second that connects via Old Oak Common Lane and Union Way to Hythe Road over the canal. For those travelling by public transport, the bus strategy proposes a number of bus routes to the east - bus routes 7, 220 and 487. In line with OPDC's sustainable transport hierarchy – shown in Figure 3.9 – movement by foot, bike and public transport has been prioritised across the OPDC area over private car.</p>	N	

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134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	10	Figure/PS2/OPDC/4.2 Figure/PS2/OPDC/4.5	Places		P1	Figures 4.2 and 4.5	7. Figure/PS2/OPDC/4.2 and 4.5 Show the IEP Depot in existence beyond the Plan Period. This a large area for potential Commercial or Residential growth omitted from the original plan to my knowledge. I was not aware that the IEP Depot would stay in place for so long. Will Southern Square happen if IEP Depot stays?	Noted. The delivery of Southern Square is dependent on the development of the IEP depot. The Development Capacity Study Update identifies that the IEP depot is likely to be developed after the plan period. This relationship is illustrated in the proposed modifications to figure 4.5.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	11	Figure/PS2/OPDC/4.15	Places		P4C1	Figure 4.15	8. Figure/PS2/OPDC/4.15 (1 Lakeside Drive) An area I know personally has five "green open spaces" but only two of them are open to the public, and one is closed to the public, with some of the publicly accessible open space soon to be closed to the public. The walking and cycling route to the North is not going to happen.	No change proposed. Policy P4C1 provides guidance to support public access into and/or improve the quality of existing open spaces including Diageo Lake and Gardens and Metropolitan Open Land to the west of 1 Lakeside Drive. OPDC's Infrastructure Delivery Plan identifies the new/upgraded walking and cycling route through First Central as a necessary project to support local connectivity. This is part committed and will be funded through developer contributions.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	12	Figure/PS2/OPDC/4.19	Places		P6	Figure 4.19	9. Figure/PS2/OPDC/4.19 Does not show how the Asda junction is to work, and it does not show the approved 17 storey hotel approved by Ealing Council at the entrance to Central Middlesex Hospital.	No change proposed. Figure 4.19 reflects the requirements for the junction set out in policy P4. Further information is set out in OPDC's Infrastructure Delivery Plan. The 17 storey hotel site is demarcated adjacent to the junction, with requirements for any development on the site to deliver active frontages. The hotel has not yet been implemented.	N	

134	Community / interest group	John Haston	West Twyford Residents Association (John Haston)	13	General	Consultation	<p>It really is all too much to take in and make proper judgements on the modifications within the time available. I have made what comments I can make in the time available. I do not get a clear picture of what Old Oak Park Royal will look like in the future from these modifications and how it is all interconnected and viable.</p>	<p>No change proposed.</p> <p>The modifications process is part of the examination stage. The approach undertaken by OPDC accords with the Planning Inspectorate's Procedure Guide for Local Plan Examinations and was agreed by the Planning Inspector.</p> <p>OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>OPDC is committed to informing and involving stakeholders, including the local community, in helping to influence planning policy wherever possible. We believe that consulting properly leads to improved outcomes for plans, to meet the needs of the communities they serve.</p> <p>As we finalise the Local Plan, the scope for influence inevitably narrows. This reflects that the majority of the Local Plan remains unchanged. OPDC's proposed modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains the same and we produced a leaflet summarising the key points of change. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan. The purpose of the consultation was to seek input on the changes proposed, rather than the whole of the Local Plan, which has previously been subject to extensive consultation comprising 25 weeks with 28 events held delivering over 11,000 comments.</p> <p>That said, it's important to us to ensure that everyone, including those who are from underrepresented groups, has the opportunity to understand the changes proposed, ask questions, make representations and have their views heard. To ensure this, we delivered a transparent, comprehensive and accessible, best-practice 7-week consultation process that exceeded the requirements set out in our Statement of Community Involvement. The consultation comprised:</p> <ul style="list-style-type: none"> • A 7-week consultation period using a hybrid approach to enable people to respond both online and offline in accordance with the Government's Covid-19 related guidance at the time of consultation. • Publishing a Consultation Plan setting out the consultation process to ensure transparency. • Offering and holding one-to-one engagement meetings with political, community, business, landowners, infrastructure providers and public sector stakeholders. • Publishing a press release and coordinating with boroughs to promote this information on local, trade and London-wide publications. • Publishing adverts in hardcopy and online publications of the Brent and Kilburn Times and Get West London. • Carrying out a targeted social media campaign on Facebook and Instagram that reached over 900,000 people. • Providing updates on social media via Facebook, Instagram, Twitter and LinkedIn. • Writing to 44,000 properties in and around the OPDC area. • Putting up posters at key locations across the OPDC area. • Issuing e-newsletters to all of OPDC's subscribers. • Providing briefings to key community and business groups. • Carrying out five public online events presenting an overview of the changes, how to respond and further details of key changes. • Launching a bespoke digital consultation platform and held all materials including copies of the modified Local Plan, an explanatory leaflet in plain English, an extensive set of FAQs, walk-through videos, videos of the public events and online feedback forms. Nearly 1,000 people visited the site, downloaded over 900 documents and watched over 400 videos. • Updating OPDC's webpages which sits on the Mayor of London's website, London.gov.uk. • Providing paper copies of consultation materials at local locations, including hardcopy feedback forms and secure boxes to leave them. • Offering all consultation material to be available in hardcopy, to be translated and to be available in Braille or audio format. 	N
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												<ul style="list-style-type: none"> An open offer for officers to attend community events and hold one-to-one meetings with community members. A dedicated phonenumber, email address and postal service open during office hours for community members to speak directly to OPDC's planning policy team and have queries answered. Enabling consultation responses to be provided via a range of ways comprising by email, online feedback form, phone, letter and via ballot boxes. <p>OPDC has reviewed all comments received during the consultation and has published a schedule of responses noting where further modifications are proposed.</p>		
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	14		Strategic Policies		SP10		<p>For the biggest regeneration project in Europe it has a fair share of failures to date.</p> <p>a. The Elizabeth Line marshalling depot relocation not now until 2036?</p>	<p>No change proposed. The proposed modifications did not amend this part of the Local Plan. The Local Plan continues to identify the potential development of the Elizabeth line depot after the plan period while supporting its earlier development.</p>	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	15		Strategic Policies		SP8		<p>For the biggest regeneration project in Europe it has a fair share of failures to date.</p> <p>b. The inclusion of so many Cemeteries as green space - hardly the place to take a dog a walk or play football with the children.</p>	<p>No change proposed.</p> <p>Cemeteries are recognised as a type of open space, and so have been identified for protection in the Local Plan in that context. While they do serve some recreational value for the local community, they are not being relied upon to meet the needs of public open space for new developments. For this, OPDC will require new development to contribute towards 30% of developable lands outside of SIL as publicly accessible open space, including the delivery of two new Local Parks of a minimum 2 ha in size.</p>	N	

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134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	16		Strategic Policies		SP10		<p>For the biggest regeneration project in Europe it has a fair share of failures to date. c. Granting Developers the right to develop high density remote sites not shown previously within residential clusters - Wales Farm Road, Lakeside Drive and parts of Scrubs Lane. Not to mention the practise of allowing developers the right to change plans after approval, by reducing floor to floor heights and adding more storeys to the height of the building - 10 more stories on one application. And all developments never meeting the Mayor of London's target of 50% affordable housing - which was an aim at the outset of the OPDC.</p>	<p>No change proposed.</p> <p>Wales Farm Road, Lakeside Drive and Scrubs Lane were previously and continue to be identified for residential led development in the Local Plan.</p> <p>The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.</p> <p>Any proposal to modify an existing permission is determined through the development manage process in accordance with the development plan policies and material considerations.</p> <p>OPDC's Local Plan policy SP4 sets an overarching target for delivering 50% affordable housing. This is demonstrated to be deliverable in OPDC's Affordable Housing Viability Assessment. OPDC continues to consider this is deliverable.</p>	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	17		Places		P2		<p>For the biggest regeneration project in Europe it has a fair share of failures to date. d. Car Giant refusing to relocate from Old Oak North so late into the OPDC Development</p>	<p>Noted. OPDC's proposed modifications seek to address the inspector's interim findings in relation to the Cargiant site allocation.</p>	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	18		Places		P1		<p>For the biggest regeneration project in Europe it has a fair share of failures to date. e. HS2 station's limited access for Old Oak Residents with no real car parking - medium or long term.</p>	<p>No change proposed. OPDC's aspirations for HS2's Old Oak Common Station is for travel to and from the station to be by foot, cycle or bus, in line with OPDC's sustainable transport hierarchy. Therefore, the station does not provide for car parking for commuters. Instead, the station proposals include a new surface transport interchange and cycle hub, and OPDC's Local Plan supports upgrades to the connecting streets for pedestrians and cyclists.</p>	N	

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134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	19		Transport		T4		For the biggest regeneration project in Europe it has a fair share of failures to date. f. Failure to get TfL agreement to key new railway stations.	No change proposed. OPDC has been working closely with TfL throughout the development of the Local Plan and has a Statement of Common Ground setting out TfL's agreement to key new railway stations	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	20		Design		D7		For the biggest regeneration project in Europe it has a fair share of failures to date. g. Failure to secure local historical buildings protected - but not listed - from Developers to date.	No change proposed. The Local Plan provides policies to conserve and enhance heritage assets. Heritage assets are identified on the Policies Map. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	21		Strategic Policies		SP10		For the biggest regeneration project in Europe it has a fair share of failures to date. h. No attempt to 'Zone Major Industries, such as waste recycling and food production, from large Commercial districts from Residential developments. Or any attempt to limit residential densities in sensitive areas. All developers going for the maximum rate of return with the highest densities so far.	No change proposed. The Local Plan did previously and continues to provide guidance for supporting Strategic Industrial Location areas and delivering new mixed use areas. The proposed modifications did not amend the principle for delivering high quality high density mixed use development in areas outside of SIL. Policy SP9 requires development to be optimised in a sustainable manner while delivering the highest design quality and architecture that positively responds to context and enhances local character and identity. Policy SP9 also requires development to respond appropriately to sensitive locations including heritage assets, open spaces and existing residential communities to ensure these help shape local character and townscape. Policy SP9 is not proposed to be modified.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	22		Transport		SP7		For the biggest regeneration project in Europe it has a fair share of failures to date. i. Failure to come up with transport solution that cater for the anticipated increase in traffic expected - especially in Park Royal. With roads not wide enough for Bus Lanes, and allowing development on the edges of roads which will limit any future traffic solutions. The buses with no bus lanes available can only go as fast as the rest of the traffic.	No change proposed. The Local Plan includes a number of improvements for Park Royal roads, as set out in Policy P4. This includes removing through-traffic along the key radial roads, which will greatly reduce vehicle numbers and increase bus speed.	N	

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134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	23		Transport		SP7		For the biggest regeneration project in Europe it has a fair share of failures to date. j. Failure to address key congested traffic interchange / access points to OPDC on the A40 and A406 (North Circular) roads.	No change proposed. The Infrastructure Delivery Plan includes upgrades to junctions at the A40 and roads leading to the A406.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	24		General	General			For the biggest regeneration project in Europe it has a fair share of failures to date. k. Failure to progress to the next stage of design, showing developments on Ordinance Survey Maps - rather than blobs of colour for building clusters and squiggly lines for main traffic routes.	No change proposed. In response to the Inspector's queries regarding the Local Plan's figures relationship to an Ordinance Base, OPDC has made amendments to figures and the Policies Map - please see modification reference MM1/PS/Q2Q8Q14. OPDC considers this to be consistent with national policy and legally compliant. As proposals are progressed further detailed figures will be produced for future version of the Local Plan.	N	
134	Community / interest group	John	Haston	West Twyford Residents Association (John Haston)	25		Spatial Vision				For the biggest regeneration project in Europe it has a fair share of failures to date. l. And last but not least the total lack of an integrated Master Plan for the project - the biggest in Europe.	No change proposed. OPDC considers the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and facilitate the development of the area. This will support the delivery of sustainable high quality development across the OPDC area and deliver benefits for Londoners and local people.	N	

Respondent Reference	Respondent Type	First Name	Second Name	Organisation	Comment Reference	Modification number	Chapter / Supporting Study	General sub category	Policy	Para / Figure Reference	Comment	OPDC Officer response	Modification proposed?	Modification reference
135	Land owner	Alex	Kitt	Acton Coachworks	1	MM/PS2/OPDC/SP/38	Strategic Policies		SP10	Table 3.1	<p>We welcome the addition of Site 36 to the list of site allocations in Table 3.1. The landowner of 3 School Road's design feasibility studies have clearly identified the allocation's potential for the delivery of new residential and commercial development. Nevertheless, the Main Modification is not considered to be effective as it does not optimise housing or commercial capacity. Our design feasibility has indicated that both sites could accommodate a significantly increased level of development. As such, the allocation does not maximise the development/intensification opportunities, contrary to the objectives of the NPPF and London Plan. The allocation also does not confirm support for the potential for tall buildings, and therefore does not align with the OPDC Tall Buildings Study (March 2021) and modified Figure 3.15. Finally, the allocation does not confirm the acceptability of phased delivery, and further flexibility should be clarified in this regard so as to not delay development coming forward on this key allocation.</p> <p>The allocation should be amended to cater for increased capacity, in line with NPPF and London Plan objectives. In this regard the reference to 250 net additional housing units should be clarified as a minimum number with opportunities to maximise development on the site through a design-led approach. The allocation should also clearly state that a phased approach to development is acceptable, allowing each site to come forward individually subject to detailed design and layout considerations. Furthermore, as per the findings of the OPDC Tall Buildings Study (March 2021), reference should be made to the allocation being suitable for tall building(s).</p>	<p>No change proposed. Table 3.1 provides development capacity and phasing information. It does not provide tall building guidance. Figure 3.15 supporting policy SP9 identifies the site as appropriate for a tall building.</p> <p>The development capacity for the site is set out in the Development Capacity Study Updates. This sets out the methodology for how the development capacity has been defined. This methodology accords with the National Planning Practice Guidance for producing a Housing and Economic Land Availability Assessment.</p> <p>Table 3.1 identifies that site allocation housing capacities are minimums. Should a proposal seek to increase the housing capacity, this will be determined using relevant development plan policies and material considerations.</p> <p>Table 3.1 identifies that site allocation commercial or industrial capacities are minimums. Should a proposal seek to amend this capacity, this will be determined using relevant development plan policies and material considerations.</p> <p>Policy SP10 provides support for optimising capacity across sites.</p> <p>OPDC considers the proposed modifications to figure 3.15 and the Tall Buildings Statement Update showing tall building locations to be in general conformity with the 2021 London Plan. The Mayor has confirmed the Local Plan is in general conformity with the London Plan in respect of its approach to tall buildings. See comment reference 82/15.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p>	N	
135	Land owner	Alex	Kitt	Acton Coachworks	2	Figure/PS2/OPDC/3.15	Strategic Policies		SP9	Figure 3.15	<p>The proposed modification to Figure 3.15 to include 3 School Road / 99 Victoria Road within the North Acton Tall Buildings Area is welcomed given the work which has been undertaken by the landowner of 3 School Road and their project team to demonstrate that the site can deliver tall buildings and higher-density development. The identification of the site as a location appropriate for tall buildings will assist in the design of a high-quality scheme which seeks to deliver housing and commercial floorspace to meet the Local Plan's targets. However, the site should be earmarked as a specific location where tall buildings are an appropriate form of development (i.e. with a purple star symbol). Our feasibility studies have clearly identified the site's potential for tall buildings and, in line with London Plan and NPPF objectives, further policy clarification should therefore be provided to support the site's optimisation.</p> <p>The site should be earmarked as a specific location where tall buildings are an appropriate form of development (i.e. with a purple star symbol).</p>	<p>No change proposed. 3 School Road / 99 Victoria Road is identified as an area where tall buildings are an appropriate form of development. OPDC considers this is appropriate.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>No change proposed. The 2021 London Plan forms part of OPDC's development plan. Therefore repetition of policies is not required.</p>	N	

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135	Land owner	Alex	Kitt	Acton Coachworks	3	MINOR/2/P7/8	Places		P7		<p>The proposed modification does not align with the objectives of the Tall Building Study and Figure 3.15 (Sensitive Locations and Tall Building Locations). The proposed modification seeks to limit building heights to the north of Old Oak Street to 10 or 12 storeys; however, Site Allocation 36 (3 School Road / 99 Victoria Road) is identified as a location suitable for tall buildings in Figure 3.15, as well as the Tall Buildings Statement (May 2021). Site Allocation 36 is located to the north of Old Oak Street (as can be seen from Figure 4.21) and, on this basis, would therefore be captured by the 10 to 12 storey buildings reference in the modified Policy P7. The definition of tall buildings in the Tall Buildings Statement (May 2021), however, is 'a minimum of 15 storeys or a minimum of 48 metres above ground level'. The proposed Minor Modification is therefore not sound as it conflicts with the Tall Buildings Statement and Figure 3.15.</p> <p>Policy P7 clause 1) ii. should be amended as follows in order to align with the Tall Buildings Statement and Figure 3.15: 'within Acton Wells East, generally 10 to 12 storeys along Victoria Road north of Site Allocation 36 (3 School Road / 99 Victoria Road).' Table 4.1 should also be modified (Column 1, Row 2) to state that 10 to 12 storey development facing onto Victoria Road will be sought north of Site Allocation 36.</p>	No change proposed. Policy P7(l) relates to Acton Wells East. Site allocation 36 is not in Acton Wells East.	N	
135	Land owner	Alex	Kitt	Acton Coachworks	4		Tall Building Statement Update				<p>The proposed modification to the Tall Buildings Statement Update (May 2021) to include 3 School Road / 99 Victoria Road within the North Acton Tall Buildings Area is welcomed given the work which has been undertaken by the landowner of 3 School Road and their project team to demonstrate that the site can deliver tall buildings and higher-density development. The identification of the site as a location appropriate for tall buildings will assist in the design of a high-quality scheme which seeks to deliver housing and commercial floorspace to meet the Local Plan's targets. Additionally, the definition of a tall building in the OPDC area as being 'above 15 storeys or above a minimum of 48 metres above ground level' is also welcomed, and is considered to be consistent with the requirements of London Plan policy. However, the site should be earmarked as a specific location where tall buildings are an appropriate form of development (i.e. with a purple star symbol). Our feasibility studies have clearly identified the site's potential for tall buildings and, in line with London Plan and NPPF objectives, further policy clarification should therefore be provided to support the site's optimisation.</p> <p>The site should be earmarked as a specific location where tall buildings are an appropriate form of development (i.e. with a purple star symbol). The Statement should also note, after paragraph 3.17, that a design-led approach to the optimising of sites is supported, in line with London Plan Policy D3.</p>	<p>No change proposed. 3 School Road / 99 Victoria Road is identified as an area where tall buildings are an appropriate form of development. OPDC considers this is appropriate.</p> <p>The approach to tall buildings is evidenced through OPDC's Views Study, Tall Buildings Statement update and through various spatial supporting studies, notably, in relation to the proposed modifications, the Channel Gate Development Framework Principles and the Scrubs Lane Development Framework Update.</p> <p>No change proposed. The 2021 London Plan forms part of OPDC's development plan. Therefore repetition of policies is not required.</p>	N	

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135	Land owner	Alex	Kitt	Acton Coachworks	5	MM17/PS/Q3e	Design			Principles for securing high quality design	<p>The proposed modification suggesting that a s106 monitoring contribution can be provided to enable the OPDC to commission design advice, if the original architects are not retained for the detailed design stage, is not considered to be justified or effective. Design will continue to be a key consideration in the determination of amendment applications, which would still be considered against the same policies and be subject as necessary to the same Design Review Panel rigour as the original application. It is therefore considered unnecessary and unjustified to require a separate s106 monitoring contribution.</p> <p>The Main Modification should delete Paragraph 5.9 so as to avoid unnecessarily burdening applicants.</p>	No change proposed. OPDC considers the proposed modification is justified and effective and required to secure high quality design. This reflects the content of 2021 London Plan policy D4 to maintain design quality.	N	
135	Land owner	Alex	Kitt	Acton Coachworks	6	MINOR/2/T4/13	Transport			T4	<p>The proposed modification to paragraph 5.75 is not sound as it does not provide sufficient flexibility in the provision of parking spaces in these areas. It should be noted that the large majority of the OPDC falls within 'Outer London' (as defined in the London Plan) and requiring car-free development in areas of PTAL 4/Outer London Opportunity Areas does not align with the maximum standards set out in London Plan Table 10.3 / Policy T6.1.</p> <p>The proposed replacement of 'strongly encouraging' with 'requiring' should be removed.</p>	<p>No change proposed. Car parking provision has been restricted in line with public transport accessibility levels, as required by the London Plan. The London Plan supports local authorities setting more restrictive parking policies, and states that for outer London Opportunity Areas, such as OPDC, the approach to parking should be set out in an Opportunity Area Planning Framework. The Local Plan parking policies are taken from the Old Oak and Park Royal Opportunity Area Planning Framework, informed by the Old Oak Strategic Transport Study and therefore align with the approach set out in the London Plan.</p> <p>The replacement of 'strongly encouraging' with 'requiring' was changed to ensure general confirming with the 2021 London Plan.</p>	N	
135	Land owner	Alex	Kitt	Acton Coachworks	7	MM/PS/OPDC M9(1)	Housing			H2	<p>The proposed Main Modification is not sound as it does not align with the requirements of the London Plan (2021), which refers to intermediate housing as offering 'Londoners on average incomes a lower rent'.</p> <p>The Main Modification should be removed and clause d) should be retained to state 'average income', so as to align with the London Plan.</p>	No change proposed. The income requirements for Intermediate housing for rent and sale are set out in the 2021 London Plan. This particular clause does not supersede these income requirements but references how the local boroughs seek to ensure that it is affordable to households on their Intermediate housing waiting list.	N	
135	Land owner	Alex	Kitt	Acton Coachworks	8	MM/PS2/OPDC/E3/1	Employment			E3	<p>The proposed modification to supporting text paragraph 9.25 to allow the type, quantum and market rate of affordable workspace to be considered on a site by site basis is welcomed and is considered to be sound as it provides sufficient flexibility to cater for individual scheme requirements.</p> <p>No changes should be made.</p>	Noted.	N	
135	Land owner	Alex	Kitt	Acton Coachworks	9	MM/PS/OPDC M2e(2)	Design			D7	<p>The proposed Main Modification to paragraph 5.75 is not effective as it does not provide sufficient flexibility to guide the location of new play space. This may, in turn, prevent the appropriate optimisation and maximisation of the development of sites, contrary to NPPF and London Plan requirements.</p> <p>The proposed Main Modification should be removed, and the paragraph should revert to its original wording so as to allow for sufficient flexibility in the design and location of new play spaces also at podium, terrace and roof levels. The policy should be further modified to refer to the potential for indoor play space, where appropriate, as indoor play spaces can serve as an innovative solution to site or environmental constraints.</p>	No change proposed. Policy D8 refers to delivering play space in these locations as a priority. The proposed modifications did not amend Policy D8.	N	

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135	Land owner	Alex	Kitt	Acton Coachworks	10	MINOR/PS/Q1b Figure/PS2/OPDC/3.16	Strategic Policies		SP10		<p>Whilst the modification to bring forward the phasing of Site Allocation 36 (3 School Road / 99 Victoria Road) from 'SIL to 0 to 20 years' to '6 to 10 years' is welcomed, it is nevertheless considered that the modification is still not entirely effective. Given the design work which has been undertaken to date in relation to 3 School Road, it is considered that the site can be delivered at an earlier phase, notably at the '0 to 5 years' phase. An appropriate earlier phasing would ensure that the Local Plan is underpinned by an up to date understanding of the development pipeline, thereby enabling an appropriate assessment of its housing land supply, in line with NPPF and London Plan objectives.</p> <p>The phasing of Site Allocation 36 (3 School Road / 99 Victoria Road) should be changed to '0 to 5 years' for the reasons set out above.</p>	No change proposed. It is not currently considered appropriate to allocate the site within 0-5 years as there has been no planning application submitted for the site. However, earlier delivery would be supported by policy SP10 which supports development to come forward in advance of the phasing identified in the Local Plan.	N	
135	Land owner	Alex	Kitt	Acton Coachworks	11	Figure/PS2/OPDC/PM3	Places		P7		<p>The proposed modification to include Site Allocation 36 (3 School Road / 99 Victoria Road) within the boundary of North Acton and Acton Wells is welcomed and considered to be legally compliant and sound. The modification will ensure that the Policies Map – Places aligns with Policy P7, as well as the Tall Buildings Statement (May 2021).</p> <p>No changes required.</p>	Noted.	N	
135	Land owner	Alex	Kitt	Acton Coachworks	12	Figure/PS2/OPDC/9.4	Strategic Policies		SP10		<p>We welcome the de-designation of 3 School Road / 99 Victoria Road from SIL land. This is considered to be legally compliant and sound as it aligns with Main Modification MM/PS2/OPDC/SP/38 to Table 3.1, which has allocated the site for residential and commercial development (Site 36).</p> <p>No changes are required.</p>	Noted.	N	
136	Local Resident	Arabella	Wheeler		1	Mm/PS2/OPdc/sp/35; Mm/PS2/opdc/p3/6	Environment and Utilities		EU2		<p>The modifications appear to find in favour of a national policy to create more housing in direct conflict with a national policy on environmental and social health. Ecological diversity must be considered, including the provision of green corridors. The stated conclusion of the OPDC's own research is that three parks would be the right amount for such a huge development.</p> <p>These green spaces are vital to the health of a community going forward. Reinstate three parks rather than new housing. Take note of your own findings about how much green space will be needed to support this community</p>	<p>No change proposed.</p> <p>Due to the proposed retention of the Old Oak North as SIL, it is no longer deliverable to provide the two Local Parks that were previously proposed for this place, one of which was to be centred on the Grand Union Canal and form part of an expanded Birchwood Nature Reserve within Old Oak South.</p> <p>A proposed new Local Park has been identified for the Channel Gate place to support that new community, in addition to the Local Park being proposed adjacent to Old Oak Common Station. New communities at North Acton and Acton Wells will be within the same distance of a Local Park as they were previously.</p> <p>While the number of Local Parks to be delivered within the plan period is reduced from three to two, the requirement for the 30% of the developable land outside of the SIL to be delivered as publicly accessible open space remains. The same amount of overall public open space is to be provided as was previously proposed, though more of this will now be delivered through smaller public open spaces.</p>	N	

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137	Local Resident	Magdalen	Evans		1		General	Extent of changes			The plan has changed significantly since 2018 and consultation on these changes has been inadequate especially on Channel Gate as a future housing site and major town centre	<p>No change proposed. OPDC considers that the proposed modifications are sound. The modifications have been produced in response to requests by the Planning Inspector including those made in response to the Inspector's Interim Findings. The majority of the Local Plan remains unchanged. The majority of modifications relate to the spatial policies within the Places chapter and resultant impacts on infrastructure proposals in other parts of the Local Plan.</p> <p>The majority of modified sites for development were previously identified for development in the Submission Local Plan. In particular, Channel Gate was identified for a high density industrial area and Acton Wells for a high density mixed use area. The proposed modifications continue to identify these areas for high density development. The Local Plan previously identified Atlas Junction as a neighbourhood town centre. The proposed modifications continue to support town centre uses at Atlas Junction and Channel Gate reflecting the modified location of the Old Oak major town centre.</p> <p>The proposed modifications were presented to community members in November 2020 and were subject to the Main Modifications consultation as part of a comprehensive consultation process.</p>	N	
137	Local Resident	Magdalen	Evans		2		General	Support for community group comments			In general terms I support the representations from the old Oak Neighbourhood Forum.	Noted. Please refer to the responses to the St. Quintain and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
137	Local Resident	Magdalen	Evans		3		General	General			I am also interested in the cultural engagement across the site and improving links with those who already live and work in the neighbourhood. Very few people working at the prison on Du Cane Road for instance appear to know what's coming down the tracks nearby	Noted. OPDC's In the Making projects are carrying out a series of culture related projects with local communities.	N	
137	Local Resident	Magdalen	Evans		4		General	General			and it strikes me that there's an opportunity to work with the careers department and the Reducing Reoffending governor there.	Noted. Paragraph 9.35 refers to the need to look at ways to proactively encourage applications from a number of groups including ex-offenders. The supporting text also refers to OPDC working with partners and stakeholders on employment and training initiatives.	N	

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138	Local Resident	Vic			1		General	Community cohesion and character			General comments on the modified plans: To get better community support there needs to be a greater focus on short term measures to complement the long term strategic plans.	No change proposed. The Local Plan provides policy guidance to shape development over a 20 year period (2018 to 2038). In addition to the this, OPDC's Delivery Directorate is also delivering a series of short term projects as part of the In the Making programme with direct community engagement and input.	N	
138	Local Resident	Vic			2		Design		D5		The area around Old Oak is fast deteriorating in the resi areas as the HS2 project an HMO related issues create problems.	No change proposed. Policy H7 provides guidance to manage shared housing. This includes contributing to creating mixed and balanced communities. The proposed modifications did not amend Policy H7.	N	
138	Local Resident	Vic			3		Design		D5		Strongly support channel Gate local park there is poor access to quality green space near old oak lane.	Noted.	N	
138	Local Resident	Vic			4		Design		D5		There is lots of dust, pollution flytipping. Existing environmental quality is poor.	No change proposed. The Local Plan has a series of policies to mitigate the impacts of construction. Policies D5, EU4, EU5 and P8 provide specific guidance to mitigate the impacts of noise, light and air pollution and policy T8 provide guidance to manage the impacts of construction traffic. OPDC's remit is limited to its role as a local planning authority. Parking Enforcement and waste collection remain the responsibility of the relevant local authority.	N	
138	Local Resident	Vic			5		Strategic policies		SP8		Support more greening – OPDC is one of the least green locations in London. Even though it is an industrial estate, it needn't be as grey as it is. Existing residential areas are similarly affected by a lack of mature trees and greening in the streets.	No change proposed. Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.	N	

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138	Local Resident	Vic			6		Strategic policies		SP7		Bridge between Willesden Junction and Old Oak lane. – this needs major upgrade as is a harsh environment for pedestrians and cyclists. It is car and HGV dominated and pedestrians are squeezed on narrow footways. Options to improve could include a new bridge for bikes and pedestrians. Or in the shorter term, narrow the carriageway as part of traffic calming, give over more of the width to pedestrians and segregated cyclists with some planting. As it leads into a 20mph speed limit there is justification to narrow the carriageway as vehicles will be travelling slowly. Improve access from old oak Lane to Scrubs. The current walking route is harsh and unpleasant.	<p>No change proposed.</p> <p>OPDC considers that the proposed modifications will continue to enable the Local Plan to deliver the Local Plan's Spatial Vision and will support the delivery of sustainable high quality development across the OPDC area. The Local Plan and IDP set out a range of new and enhanced connections which will ensure that Old Oak, Willesden Junction and Harlesden are well connected.</p> <p>The location of the town centre now relates more strongly to existing links via Old Oak Lane, and will be supported by a series of new and enhanced connections, including proposals for improvements to Willesden Junction Station which will significantly improve pedestrian and cycle connectivity between Harlesden and the OPDC area.</p>	N	
138	Local Resident	Vic			7		Design		D5		Buffer between SIL and Island Triangle. Currently the new resi development proposed gets a buffer zone. The conservation area doesn't benefit from this. Suggest apply an equivalent buffer to the existing homes to protect from new commercial uses. Land should be zoned commercial closer to homes, and industrial further away to avoid noise/pollutions nuisance etc.	Local Plan policy SP8 requires 30% of development to be public open space. This will include the delivery of two new 2-hectare Local Parks, smaller open spaces and improvements to existing open spaces. Policy EU2 requires an overall increase in green cover and a net gain in biodiversity.	N	
138	Local Resident	Vic			8		Housing		H7		HMOs – number of HMOs is growing rapidly in Old Oak. Landlords are taking advantage of small cheap cottages that still allow for the conversion to the same number of units as a much larger more expensive house. The standards of these HMOs are squalid with no access to bin storage forcing flytipping and the floorspace tiny creating appalling housing and slum creation. A strong planning policy is required to prevent these inappropriate conversions and poor living conditions for those residents.	No change proposed. Policy H7 states that where existing HMOs are of a poor standard or amenity, OPDC will consider proposals to either improve the accommodation's standard or accept its loss to an alternative housing use. The local authorities have additional powers under the Housing Act to licence and manage HMOs.	N	
139	Politician	Cllr Tom Miller			1		General	General			In particular I wish to comment on the following headings: Positively prepared: a strong effort has been made to respond to Planning Inspectorate concerns, subject to public consultation, including with key stakeholders.	Noted.	N	
139	Politician	Cllr Tom Miller			2		Places		P2		Justified: The changes are prompted by a Planning Inspectorate intervention, but are also justified in their own right. Moving employment provision to Old Oak North will have a positive effect on my residents as it will become closer to their area and routes of travel. Likewise, this will counter a 'suburban sprawl' effect by breaking up housing provision with a more mixed use of land, and will also have the positive effect of enhancing local business by providing potential customers, rather than new businesses to compete with, in the immediate vicinity.	Noted.	N	
139	Politician	Cllr Tom Miller			3		General	General			Effective: This is a very high level way to achieve the objectives as stated above, and deserves to be seen as strategic rather than an operational attempt to embed these objectives. However, this is within the context of a masterplan, and as such represents an effective attempt to meet the stated outcomes.	Noted.	N	

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140	Local Resident	Tania	Martin		1		General	Support for community group comments			As a STQW committee member and resident in the STQW neighbourhood area, I support the representations made by the StQW Forum.	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	
141	Infrastructure provider	Amanda	Gregory	North West London Clinical Commissioning Group (CCG)	1		Town Centre and Community Uses		TCC3	Paragraph 10.30	<p>Thank you for the opportunity to comment on the modified draft Local Plan. The CCG supports the modifications to the plan. Our representation focuses on paragraph 10.30 of the modified plan which supports Policy TCC3: Social Infrastructure.</p> <p>The CCG supports in principle a new facility in the North Acton and Acton Wells area. However, we consider that healthcare infrastructure requirements will need to be kept under review to address the timing and distribution of housing supply over the medium to longer-term. This could include the potential for a second facility in a different 'Place' from 2028 onwards. The paragraph should also refer to the planned expansions to existing facilities which will absorb some of the additional demand and influence the scale and location of the new provision. These expansions are referred to in the Social Infrastructure Needs Study Addendum (February 2021) and Infrastructure Delivery Plan (February 2021).</p> <p>Therefore, we suggest paragraph 10.30 is further amended to read:</p> <p>In respect of health, modelling undertaken by the Clinical Commissioning Groups (CCGs) shows the need for 1,564sqm of on-site health facility space within the Local Plan period, supported by expansions to existing facilities in the area. The Local Authorities and CCGs have confirmed that the preferred approach for the delivery of the on-site floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. However, requirements will need to be kept under review, including the potential for a second facility in the longer-term. The Social Infrastructure Needs Study has assessed different site options for the new facility and identifies North Acton and Acton Wells as the preferred option, based on current projections.</p>	Change proposed. Paragraph 10.29 is proposed to be updated to reflect updated health infrastructure requirements. This reflects statements within the Social Infrastructure Needs Study Update requiring the need for flexibility in health infrastructure planning.	Y	141/1

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142	Local Resident	Catherine	Mannheim		1		General	Support for community group comments			I am a local resident and on the Residents Committee since many years. Having read the information I support all the representations made by the St QW Forum after many discussions	Noted. Please refer to OPDC's responses to the St. Quintin and Woodlands and Old Oak Neighbourhood Forums' comments.	N	