

OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Duty to Cooperate Statement Submission Version

LOCAL PLAN SUPPORTING STUDY

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MAYOR OF LONDON

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1. Introduction to the Duty to Cooperate

- 1.1. 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'.
- 1.2. 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.
- 1.3. The Old Oak and Park Royal Development Corporation (OPDC) was established as a local planning authority in April 2015, and OPDC's Local Plan is a Development Plan Document (DPD), therefore the Duty to Cooperate generally applies to the preparation of this document.
- 1.4. The Duty to Cooperate specifically relates to 'strategic matters' which are defined as follows:
 - sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
 - sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.
- 1.5. 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:
 - The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.6. 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.
- 1.7. The National Planning Policy Framework (paragraph 179) also highlights the need for local planning authorities to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and are reflected in individual local plans. Joint working should allow local planning authorities to work together to meet development requirements that cannot be wholly met within a single local planning area. Local planning authorities should also take account of different geographic areas, including travel-to-work areas. Local planning

authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development and infrastructure (paragraphs 162 and 180).

- 1.8. Cooperation should be a continuous process of engagement, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development. Local planning authorities are expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This evidence could include:
 - joint research and evidence gathering to define the scope of the Local Plan, assess policy impacts and assemble the necessary material to support policy choices.
 - Plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy.
- 1.9. A Planning Inspector can consider whether this duty has been complied with in the examination of planning documents.
- 1.10. The preparation of Local Plans is governed by the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended). This sets out a list of prescribed bodies that the Duty to Cooperate applies to, which includes:
 - the Environment Agency
 - the Historic Buildings and Monuments Commission for England (known as Historic England)
 - Natural England
 - the Mayor of London
 - the Civil Aviation Authority
 - the Homes and Communities Agency
 - each clinical commissioning group established under section 14D of the National Health Service Act 2006
 - the National Health Service Commissioning Board
 - the Office of Rail Regulation
 - Transport for London
 - each Integrated Transport Authority
 - each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
 - the Marine Management Organisation
 - local enterprise partnership
 - local nature partnership
- 1.11. As advised in the Planning Practice Guidance, the Duty to Cooperate is not a duty to agree. However, local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.
- 1.12. The purpose of this paper is to provide information on the constructive, active and continuous process of engagement which has underpinned the preparation of OPDC's Local Plan. This is a 'live' document up to the point of submission, and its contents have been updated throughout the ongoing preparation of the Local Plan. Versions of this Statement have been published as part of the consultation process to allow for consultees to comments on its contents prior to submission of the Plan.

2. Our Strategic context

- 2.1. OPDC's boundary (See Appendix 1) spans 650 hectares, and includes parts of the London Boroughs of Brent, Ealing and Hammersmith and Fulham, in West London. The boundary covers both the Old Oak and Park Royal Opportunity Areas identified in the Mayor's London Plan (2016), and described in more detail in the Old Oak and Park Royal Opportunity Area Planning Framework (2015). Collectively, these two Opportunity Areas are identified as having the potential to accommodate 25,500 new homes and 65,000 jobs and constitutes London and the UK's largest regeneration project.
- 2.2. Within the boundary, there are three notable character areas: Old Oak, Park Royal and Wormwood Scrubs; and features which pass through and beyond the OPDC boundary, such as the canal, railways and road infrastructure.
- 2.3. Today, the Old Oak area is dominated by rail lines and related land uses south of the Grand Union Canal, with large industrial sites to the north. However, the OPDC area and particularly Old Oak, is set to be transformed in 2026 with the opening of Old Oak Common Station. The new station will connect the Elizabeth line and National Rail services to the newly built High Speed 2 (HS2) line in a station nearly the size of Waterloo, accommodating approximately 250,000 passengers a day. The HS2 line will dramatically improve accessibility and capacity between London and a number of Britain's major cities, serving millions of people, in order to boost economic growth. The Elizabeth line, currently being constructed by Crossrail, will stretch over 60 miles from Reading and Heathrow in the west across to Shenfield and Abbey Wood in the east. It will stop at 40 stations – including Old Oak Common station - and serve approximately 200 million people each year. When it becomes operational, it will transform travel across the city and the south east, and provide new capacity on London's transport network. As a direct consequence of being part of these nationally and regionally significant infrastructure projects, Old Oak will be within 10 minutes journey time of London Heathrow, the City and the West End and 38 minutes of Birmingham.
- 2.4. Central Government also own the majority (over 75%) of the core development area in Old Oak and this strong public sector interest provides opportunities for the public sector to act as a coordinator and potential master developer. OPDC is working closely with both central Government and HS2 Ltd to facilitate and co-ordinate development. This has resulted in a Memorandum of Understanding (MoU) between Central Government, the Mayor of London and OPDC which secures an agreement in principle to transfer all public sector and central Government owned brownfield land around Old Oak to OPDC for redevelopment.
- 2.5. Centred on the new Old Oak Common transport superhub, the London Plan identifies that development of Old Oak could deliver a minimum 24,000 homes and 55,000 jobs. The Government's investment in transport infrastructure is critical to supporting the scale and phasing of new development being planned here. The delivery of potential new local stations (such as Hythe Road and Old Oak Common Lane) and the upgrading of existing stations (Willesden Junction and North Acton) is also being planned, alongside new/improved walking and cycling connections and bus routes.
- 2.6. To the west of Old Oak is the Park Royal. Spanning 450 hectares, Park Royal is London's largest industrial estate. It is strategically located, with access to the A40 and A406 and a number of London underground stations surrounding its perimeter; close proximity to central London is also a key advantage for businesses located there. Park Royal is home to a diverse mix of businesses ranging from small

independent companies to large multinational operations. It has attracted a number of specialisms to the area, including food manufacturing, transport and logistics and film/TV and media related creative industries. A good proportion of the employees also live locally and businesses benefit from access to local supply chains/markets. The area accommodates around 1,700 businesses employing 43,100 workers; the majority of these are concentrated in Park Royal. Services provided across the OPDC area are vital to the functioning of the sub regional and London's economy and, in total, they contribute £2.1 billion in GVA to the UK economy. All of these characteristics demonstrate how significant Park Royal is for the local as well as the London and UK economy.

- 2.7. Currently, Park Royal faces a number of challenges. The area is structured on a street network that reflects its varied and continually evolving pattern of growth and redevelopment. It suffers from high levels of road congestion generated by the area's industrial functions, movement network and reliance on private vehicular transport to get to work. The strategic roads and railways create a wall of infrastructure which create barriers to movement and affect the legibility of the area. The public realm is often dominated by parking and poor quality materials/layouts with limited active frontages, and there are also existing issues relating to utilities infrastructure that will continue to impact on the functioning of the area if not addressed in the short-term. The pattern of land ownership in Park Royal is more complex than Old Oak - it is largely in mixed private ownership with the exception of Central Middlesex Hospital which is owned by the London North West healthcare NHS trust.
- 2.8. The Mayor's London Plan (2016) identifies that through redevelopment and intensification, Park Royal has the potential to deliver an additional 10,000 jobs and a minimum of 1,500 new homes. This will be particularly challenging given the issues highlighted above. Growth in London's economy and population, the densification of the city and the accelerated loss of industrial land across London will mean that remaining industrial land will need to work harder and more effectively to support the efficient functioning of the capital.
- 2.9. Collectively, Old Oak and Park Royal will be delivering the highest quantum of new homes and jobs in the capital. This scale of development will serve a wider strategic role, in helping to meet London's and sub regional housing needs, and its economic influences are significant for West London, and also London as a whole.
- 2.10. Wormwood Scrubs, covers almost 68 hectares and is located at the south of the Old Oak area. The Scrubs is a major recreational and environmental asset for the area. It is the largest open space in the London borough of Hammersmith & Fulham and is a green lung that provides people and wildlife with the opportunity to enjoy green open space. There are also some smaller public and private open spaces dotted around the OPDC area as well as Little Wormwood Scrubs located outside the area to the east.
- 2.11. Wormwood Scrubs open space is managed by the Wormwood Scrubs Charitable Trust. It is protected by the Wormwood Scrubs Act 1879, the Commons Act 2006 and as Metropolitan Open Land (MOL) in the London Plan, which affords the Scrubs the same level of protection as Metropolitan Green Belt. The Ministry of Defence have rights to access and use the Scrubs, but a key priority, in line with the MOL status, is to ensure the Scrubs is accessible to all Londoners. Given the scale of development planned in Old Oak, it is recognised that there will be an increase in users. To accord with the 1879 Act and to ensure that local people have access to the Scrubs, there is a need to consider the potential impacts on Wormwood Scrubs.

- 2.12. The whole area is heavily defined by the network of railways and busy arterial roads which run through and adjacent to the area. As well as defining boundaries, these features also act as social and physical barriers resulting in poor connectivity and between Old Oak, Park Royal and the surrounding areas. New development has the opportunity to overcome this severance and knit together this part of west London. The OPDC area is in close proximity to other Opportunity Areas including White City, Wembley and Kensal Canalside and other large-scale development sites such as Acton, Ealing and Alperton. The scale of transformation planned in the OPDC area will act as a further catalyst for the regeneration of these surrounding areas and help to unlock additional development and growth.
- 2.13. The Grand Union Canal is a key historic feature which runs through both Old Oak and Park Royal, and crosses other London boroughs as it travels between London and Birmingham. It is an environmental site of metropolitan importance and a significant amenity asset providing a valuable part of the green and blue infrastructure network.
- 2.14. OPDC is bounded by St Marys Cemetery and Kensal Green Cemetery, located in the Royal Borough of Kensington and Chelsea, and designated as a Grade I Registered Park and Garden. There are also other heritage assets within and surrounding OPDC's area. As such, developments will be required to achieve the highest standards of design.
- 2.15. A number of established residential neighbourhoods, including Harlesden, North Kensington, Acton, Stonebridge and Alperton surround the boundary. The wider region contains a number of areas within the 10% most deprived nationally, primarily to the north and south-west. Deprivation is more pronounced in access to housing and services, levels of income and employment and crime levels. The two established Town Centres at Harlesden and East Acton act as important hubs for their respective communities, providing a wide range of community services. There are a number of community facilities in close proximity to the boundary and these help to serve the needs of the existing workers and residents in the OPDC area.
- 2.16. 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; but it also create its own challenges which need to be addressed and mitigated. A minimum of 25,500 new homes and 65,000 business will generate its own demands for new infrastructure, such as new schools and health care provision, and on existing resources in the area, such as the roads, railways and open spaces which need to be planned for and mitigated, particularly at the local level.
- 2.17. Some of the potential impacts are also more wide ranging, such as those related to the use of shared environmental management infrastructure and climate change, such as the Grand Union Canal and wastewater infrastructure.

3. Demonstrating compliance with the Duty to Cooperate

Relationship with the London Plan

- 3.1. OPDC's role is defined by the Old Oak and Park Royal Development Corporation (Planning Functions) Order 2015. This confers all relevant planning powers within a defined area (see Appendix 1), including those relating to plan making, to OPDC. The requirement for Local Plans to be in general conformity with the London Plan applies equally to OPDC's Local Plan. Within London, the Planning Practice

Guidance states that the degree of cooperation needed between boroughs will depend on the extent to which strategic issues have already been addressed in the London Plan¹.

- 3.2. With regard to this, the London Plan sets out a range of strategic matters which involve or apply to the OPDC area which have already been addressed in the London Plan. For example, the London Plan identifies Old Oak and Park Royal as an Opportunity Area and sets out an indicative homes and jobs target for the OPDC area, in the same way that it sets a target for each London Borough, providing a strategic approach to housing delivery within which each Local Plan must conform. The Old Oak and Park Royal Opportunity Area Framework (OAPF) has also been published to provide supplementary planning guidance to the London Plan, including thematic and place based principles. Therefore, the extent of co-operation can be proportionate to the fact that the London Plan and OAPF have already agreed a number of strategic matters such as the principles and indicative capacity for development, as well as the principle of de-designating SIL in Old Oak.

Relationship with other Duty to Cooperate bodies

- 3.3. Other prescribed bodies are leading plans and programmes which affect the OPDC area. For example, TfL has been investigating the strategic, economic and financial business case of and availability of funding for two new London Overground stations in Old Oak. This work includes determining the operational impacts of, and requirements for, the delivery of these stations. In cases such as this, these prescribed bodies should be cooperating with OPDC as a key stakeholder in this process. There are many projects where this cooperation is taking place and OPDC has been working collaboratively with TfL and other transport providers to ensure that proposals they are developing are in line with the vision set out in OPDC’s Local Plan.

Timing

- 3.4. The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by formal consultation activities alone. Cooperation should continue until plans are submitted for examination and beyond, into delivery and review. Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) sets out the procedure for the production of Local Plans. OPDC’s Local Plan process is illustrated below:



- 3.5. OPDC commenced the production of the Local Plan after being established on 1st April 2015, and discussions with stakeholders to develop the Plan as part of the Duty to Cooperate have been ongoing since this time.

¹ Paragraph: 007 Reference ID: 9-007-20140306

- 3.6. The purpose of this paper is to provide information on the constructive, active and continuous process of engagement which has underpinned the preparation of OPDC's Local Plan. This is a 'live' document up to the point of submission, and its contents have been regularly updated throughout the ongoing preparation of the Local Plan. Versions of this Statement have been published as part of the consultation process to allow for consultees to comments on its contents prior to submission of the Plan.

Establishing cooperation arrangements

- 3.7. The engagement activities undertaken by OPDC so far, go beyond formal consultation and include regular meetings, involvement in the preparation of joint evidence base, and early and ongoing discussions on policy development and to share findings from the emerging evidence base. More detailed information on these activities is included in Appendix 2 and 3.
- 3.8. A key element of the function and purpose of the OPDC is to co-ordinate strategic development opportunities which are planned across administrative boundaries, in this case, performing the function of a local planning authority over an area that includes parts of three different London boroughs. However, the remit of OPDC is limited to its role as a local planning authority, for example the boroughs are still responsible as the housing authority, education authority, highways authority or waste collection authority for their areas. This means that ongoing co-operation will be necessary on a number of areas to ensure future delivery.
- 3.9. The formal governance and structure of OPDC, as well as the wider mechanisms that are in place for cooperation between the boroughs and the OPDC, have been and continue to be crucial elements of meeting the Duty to Cooperate. Meeting groups and governance arrangements have been established by OPDC to facilitate the sharing of information, to discuss emerging ideas and proposals and as part of formal decision making processes. These governance arrangements are described below.

OPDC Board

- 3.10. OPDC's Board has been in operation since March 2015. The OPDC Board is responsible for governing OPDC. Their general responsibilities include:
- providing leadership, advice and support
 - setting strategic direction and overall policy
 - monitoring standards, performance and corporate governance
 - representing the OPDC with other stakeholders
- 3.11. The Board comprises industry and community leaders, bringing skills and backgrounds in the following:
- business
 - transport
 - local government
 - regeneration
 - finance
 - marketing
 - education

- 3.12. OPDC's Board provides a specific context in which the three boroughs have representation and thereby direct involvement in relevant decision making processes. The scheme of delegation for decision making requires that formal planning policy decisions are made by the Board, including approval of documents prepared for consultation and for final adoption decisions.

OPDC Planning Committee

- 3.13. The OPDC Board has appointed a Planning Committee to ensure that decisions on planning applications are made in an open, transparent and impartial manner.
- 3.14. The Planning Decisions Committee has eight committee members, including:
- a Chairman who is also a member of the OPDC Board
 - three independent members
 - four elected local councillors (including two from the London Borough of Hammersmith and Fulham and one each from the London Boroughs of Brent and Ealing) who have been recommended by the three boroughs whose boundaries fall within the OPDC area.
- 3.15. The formal role of the committee is to enable the transparent, efficient and effective discharge of the OPDC's functions to determine planning applications and to respond to consultation on applications on which the Corporation is a consultee. However, planning policy documents are considered by the committee before the OPDC Board considers reports for formal decision making purposes. The views of the Planning Decisions Committee are reported to the Board in each case so that these can be taken into consideration at the time the Board makes its decision.
- 3.16. Appendix 4 sets out the key decisions made to date and demonstrates the effectiveness of partnership working with boroughs as part of the Local Plan process.

GLA

- 3.17. The OPDC is a functional body of the Greater London Authority (GLA), and as such the Mayor and London Assembly have oversight. GLA officers are also involved in regular briefings and projects related to OPDC's Local Plan (see Appendix 2 and 3).

Other internal working arrangements

- 3.18. In addition to more formal governance arrangements set out above, OPDC has directly established groups to discuss work streams and activities relevant to the development of planning policy.

Duty to Cooperate (Project Team) meetings

- 3.19. A project team meeting group was established by OPDC. Regular meetings were set up (usually every 2 weeks) in order to provide updates on emerging planning matters within the OPDC area and to act as a forum for discussion and as an opportunity for attendees to help influence and shape policy in advance of formal consultation. The meetings are attended regularly by officers from:
- OPDC
 - London Borough of Hammersmith and Fulham
 - London Borough of Ealing
 - London Borough of Brent

- Royal Borough of Kensington and Chelsea
- Greater London Authority (GLA)
- Transport for London (TFL)

3.20. In accordance with the Duty to Cooperate, OPDC has been working closely with these authorities and prescribed bodies in the ongoing development of the Local Plan. Feedback received from DtC partners played a key role in the production of both the Regulation 18 Local Plan and Regulation 19 versions of the Local Plan.

Project Steering groups

3.21. Independently from the Duty to Cooperate meetings, separate, time limited steering groups were also used as a forum to develop and share emerging Local Plan supporting studies including joint evidence base studies. These provided opportunities for more detailed discussions on the scope and approach taken forward in the evidence base. The steering groups have often consisted of representatives from the London Boroughs of Hammersmith and Fulham, Ealing, Brent and the Royal Borough of Kensington and Chelsea, the Greater London Authority (GLA) and Transport for London (TFL). Further information is provided in Appendix 2 and 3.

OPDC Panels

3.22. A number of time-limited stakeholder engagement forums/panels have been set up to inform OPDC's work as policies and programmes have been developed. These groups are dependent on the OPDC's work programme and hence are changeable and only meet when required. The current list of panels include:

- PLACE Review Group
- Transport Panel
- Housing Panel
- Environmental and Utilities Panel
- Public Sector Advisory Panel
- Public Sector Land Owners Forum

External working arrangements

3.23. OPDC also participates in following external meeting groups:

- West London Alliance
- London Waste Planning Forum
- Association of London Borough Planning Officers
- West London Chief Planning Officers Group
- West London Transport Planners (West Trans) Group

3.24. OPDC has also meet with Duty to Cooperate bodies on a 1-1 basis, including attending borough Planning Policy Liaison meetings.

4. Prescribed Duty to Cooperate Bodies

4.1. The co-operation arrangements have provided both formal and informal opportunities for each of the Duty to Cooperate bodies to input and comment on aspects of the Local Plan approach and evidence base. Appendix 2 and 3 demonstrate evidence of this. In addition to this, the Statement of Consultation provides an overall picture of formal consultation process and who we contacted and how, including the prescribed

bodies relevant to the Duty to Cooperate. The Statement of Consultation provides a response to issues raised and whether a change has been made to the Plan as a result. Where any matter raised has not resulted in a change the reason for this is also set out. OPDC has also submitted consultation responses to documents being prepared by Duty to Cooperate bodies, including Local Plans, to help inform these where relevant.

- 4.2. An overview of duty to cooperation engagement with the Duty to Cooperate prescribed bodies is provided below and in Table 1.

Environment Agency

- 4.3. The Environment Agency (EA) were consulted on and submitted responses to all of the Local Plan consultations and have participated in other engagement activities as detailed in Appendix 2 and 3. The EA's comments were focussed on the environmental policies and evidence base. Changes to the Local Plan have been made at various stages to directly address points raised by the EA, including:
- updates to the Integrated Water Management Strategy to include the sequential test and climate change allowances
 - Following a request from the EA, further work has been undertaken on green infrastructure as part of the Environmental Standards Study and policy requirements have been appropriately embedded in the Local Plan
 - Updates to policies on water and waste
- 4.4. The EA's second Regulation 19 consultation response included comments on the detailed guidance and delivery of Old Oak North in relation to SUDs and waste. Two meetings have been held with the Environment Agency to discuss these comments (see Appendix 2). The EA has confirmed that OPDC has been engaging with the EA in accordance with the Duty to co-operate.

Historic England

- 4.5. Historic England commented at each consultation stage for the Local Plan and have participated in other engagement activities as detailed in Appendix 2 and 3. Historic England's comments were focussed on the heritage policy, tall buildings policy Scrubs Lane place policy and evidence base. Changes to the Local Plan have been made at various stages to directly address points raised by Historic England including:
- including a specific policy to conserve and enhance designated heritage assets
 - including supporting text to secure contributions to address impacts on Heritage Assets at Risk
 - clarifying the implementation of policy requiring Heritage Impact Assessment
- 4.6. A key cross-boundary issue identified by Historic England is the potential negative impact of the massing of development within the OPDC area on the historic significance of designated heritage assets in Kensal Green Cemetery, a Grade I Listed Registered Historic Park and Garden. To understand whether proposals would have a negative impact, a Strategic Views Assessment was undertaken to support the Scrubs Lane Development Framework Principles. This identified that increased massing and heights may be appropriate in certain locations if development is of the highest quality design – individually and cumulatively.

- 4.7. OPDC has worked with Historic England in the development of heritage related supporting studies that informed the Regulation 19 stage consultations, including the Heritage Strategy. Historic England have confirmed that the approach to the preparation of the evidence base supporting the plan has been highly positive.
- 4.8. OPDC has also worked positively with Historic England on related relevant matters, such as the designation of a new conservation area and the proposals for OPDC's Local Heritage Listings.

Natural England

- 4.9. Natural England commented on the strategic policies and policy on biodiversity and greening at the Regulation 18 stage. They suggested that the approach could be strengthened further by:
- Incorporating a specific policy on Green Infrastructure (GI) into the overarching spatial policies to support the use of GI to deliver the social, economic and environmental objectives for the plan area
 - Better reflecting in the Plan policies the breadth of national and regional policies and strategies on GI, biodiversity and ecological networks that are relevant to OPDC plan area
 - Further developing natural environment and GI targets for the Plan, linking these to well evidenced needs and, where appropriate, identifying priority areas for specific types of GI and biodiversity delivery spatially.
 - Detailing how the range of proposed GI and biodiversity conservation and enhancement will be delivered and managed e.g. through lower tier plans and/or planning obligations, Community Infrastructure Levy or other mechanisms.
- 4.10. These comments informed changes to the Local Plan and the preparation of an Environmental Targets Study which Natural England were involved in. As a result of this, the Local Plan is aiming to ensure that at least 30% of the developable area is delivered as public open space and that development ensures the area is biodiversity positive.
- 4.11. No further representations were received at the first and second Regulation 19 stages. However, OPDC have met with Natural England on two occasions to provide updates on OPDC's emerging planning policy and masterplanning work (see Appendix 2).

GLA

- 4.12. As referred to above, OPDC works closely with the GLA. OPDC have held a series of meetings with the GLA in the development of planning policy. The GLA have been invited to OPDC's regular bi-weekly Duty to Cooperate meetings. A series of meetings with more senior stakeholders have also been arranged at key points in the development of OPDC's Local Plan to secure agreement on strategic priorities outlined in the Local Plan.
- 4.13. The GLA have made comments to both the Regulation 18 and Regulation 19 consultations and have stated within their most recent response to the second Regulation 19 consultation that OPDC's Local plan is in general conformity with the London Plan.

Civil Aviation Authority

- 4.14. The CAA were consulted as part of the Local Plan consultations and no representations were received.

Homes and Communities Agency

- 4.15. From the 1 April 2012, the GLA took responsibility for programmes, functions and funding from the Homes and Communities Agency (HCA) London region through devolution powers set out in the Localism Act 2011. OPDC has a close and good working relationship with the GLA's Housing and Land Directorate who have taken responsibility for the functions of Homes England (HCA). A representative from this team has chaired the OPDC Housing Panel since it started in 2015. One of the responsibilities of the panel is to work with OPDC on the production of the Local Plan. They have confirmed that OPDC has engaged constructively, actively and on an ongoing basis with the GLA's Housing and Land Directorate team to develop the Local Plan in accordance with the Duty to Co-operate.

CCG

- 4.16. OPDC has been engaging with the NHS North West London Collaborative of Clinical Commissioning Groups (NWL CCGs) which is a collaboration of NHS Brent CCG, NHS Central London CCG, NHS Ealing CCG, NHS Hammersmith & Fulham CCG, NHS Harrow CCG, NHS Hillingdon CCG, NHS Hounslow CCG, and NHS West London CCG. The NWL CCG group has been consulted and submitted responses to the second Regulation 19 Local Plan consultation. The Social Infrastructure Needs Study is a key output from this engagement process. The study identifies the requirements for health facilities based on extensive input and feedback from the CCGs.

Transport for London

- 4.17. Transport for London (TfL) has been extensively consulted. TfL has submitted responses to all of the Local Plan consultations and participated in other engagement activities as detailed in Appendix 2, including the preparation of evidence base as detailed in Appendix 3.
- 4.18. Key issues which have been raised at the Regulation 18 and Regulation 19 consultation stages relate to:
- Walking and cycling routes
 - Bus provision
 - Station/line enhancements and new London Overground stations
 - Depots and the operational infrastructure requirements for transport services
 - Overstation development
 - Coach facilities
 - Car parking
- 4.19. OPDC has been working with TfL to cooperate on these issues and, where appropriate changes have been made to the Plan. To help address comments, new supporting studies were commissioned and completed including the Old Oak Bus Strategy, North Acton Station Feasibility Study, Willesden Junction Feasibility Study, Public Realm, Walking and Cycling Strategy. TfL has been heavily involved in steering groups for these supporting studies and has directly authored some.

- 4.20. A Willesden Junction steering group has been set up in response to comments raised about the future potential of the station and connections into Harlesden. The group is dedicated to co-ordinating projects and programmes across the Willesden Junction area to optimise development capacity and connectivity. Members include the host boroughs and TfL. This new steering group will help ensure ongoing cooperation on this issue.
- 4.21. TfL has confirmed that OPDC has been engaging with TfL in accordance with the Duty to Co-operate.

Highways England

- 4.22. Highways England is responsible for managing the motorways and major roads in England. There are no roads managed by Highways England that fall within the OPDC area. For the road network within the OPDC area, Transport for London is the Highway Authority for the A406 and A40 and LB Ealing, LB Brent and LB Hammersmith & Fulham are the highway authorities for local roads. Notwithstanding this, Highways England was consulted during all stages of the Local Plan and no representations were received.

Marine Management Organisation (MMO)

- 4.23. The MMO have been consulted on the Local Plan. Through correspondence they have referred us to section 58(3) of the Marine and Coastal Access Act and advised that there is no need for bespoke consultation with them if development in the OPDC doesn't affect the marine area. Engagement through the consultation process has resulted in no strategic planning matters being raised by the MMO.

Office of Rail Regulation

- 4.24. The ORR were consulted as part of the Local Plan consultations and no representations were received.

London Enterprise Panel

- 4.25. The London Economic Action Partnership (LEAP) is the local enterprise panel for London, chaired by the Mayor of London. The LEAP works with London boroughs, business and Transport for London to take a strategic view of regeneration, employment and skills for London. The LEAP have been consulted as part of the Local Plan consultations and no representations were received.
- 4.26. The Local Plan contains policies on employment and skills that accord with LEAP's objectives and the Mayor's London Plan. On this basis, it is considered that the Duty to Co-operate with the LEAP has been met.

London Local Nature Partnership

- 4.27. Local Nature Partnerships (LNPs) are partnerships of a broad range of local organisations, businesses and people who aim to help bring about improvements in their local natural environment. The GLA is the named contact for the London Local Nature Partnership and LNP issues and objectives are covered by the policy framework provided by relevant London Plan policies, and strategies.
- 4.28. OPDC's Local Plan policies are consistent with this policy framework and the GLA have been invited to make representations at each stage and on all aspects of the

Plan including the policies on open space, biodiversity and greening. In their most recent consultation response, the GLA has stated that OPDC's Local Plan is in general conformity with the London Plan.

5. Planning authorities

- 5.1. Some key issues identified by planning authorities are covered under the relevant topic areas in Appendix 2.

6. Identifying strategic planning priorities

- 6.1. As mentioned elsewhere, in accordance with section 33A of the Localism Act, the Duty to Cooperate specifically relates to 'strategic matters' which are defined as follows:
- sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
 - sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.
- 6.2. Section 33A does not explicitly state which issues could be a strategic matter, so OPDC has also had regard to guidance in the NPPF, particularly the following list of strategic priorities for Local Plan (para 156):
- The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 6.3. The NPPF states that "public bodies have a Duty to Cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156" (para 178). Therefore, the NPPF priorities have been used as a starting point to assess what could be considered as a strategic matter for the purposes of section 33A. However, engagement with stakeholders, including prescribed Duty to Cooperate bodies, has helped to identify more focussed issues which OPDC has been co-operating on.
- 6.4. Appendix 2 includes more details to demonstrate how OPDC has addressed each NPPF strategic priority area and the extent of activities undertaken as part of meeting the Duty, the bodies involved (also see Appendix 5 for a Glossary of key bodies involved) as well as an overview of what has been achieved and next steps for ongoing engagement.

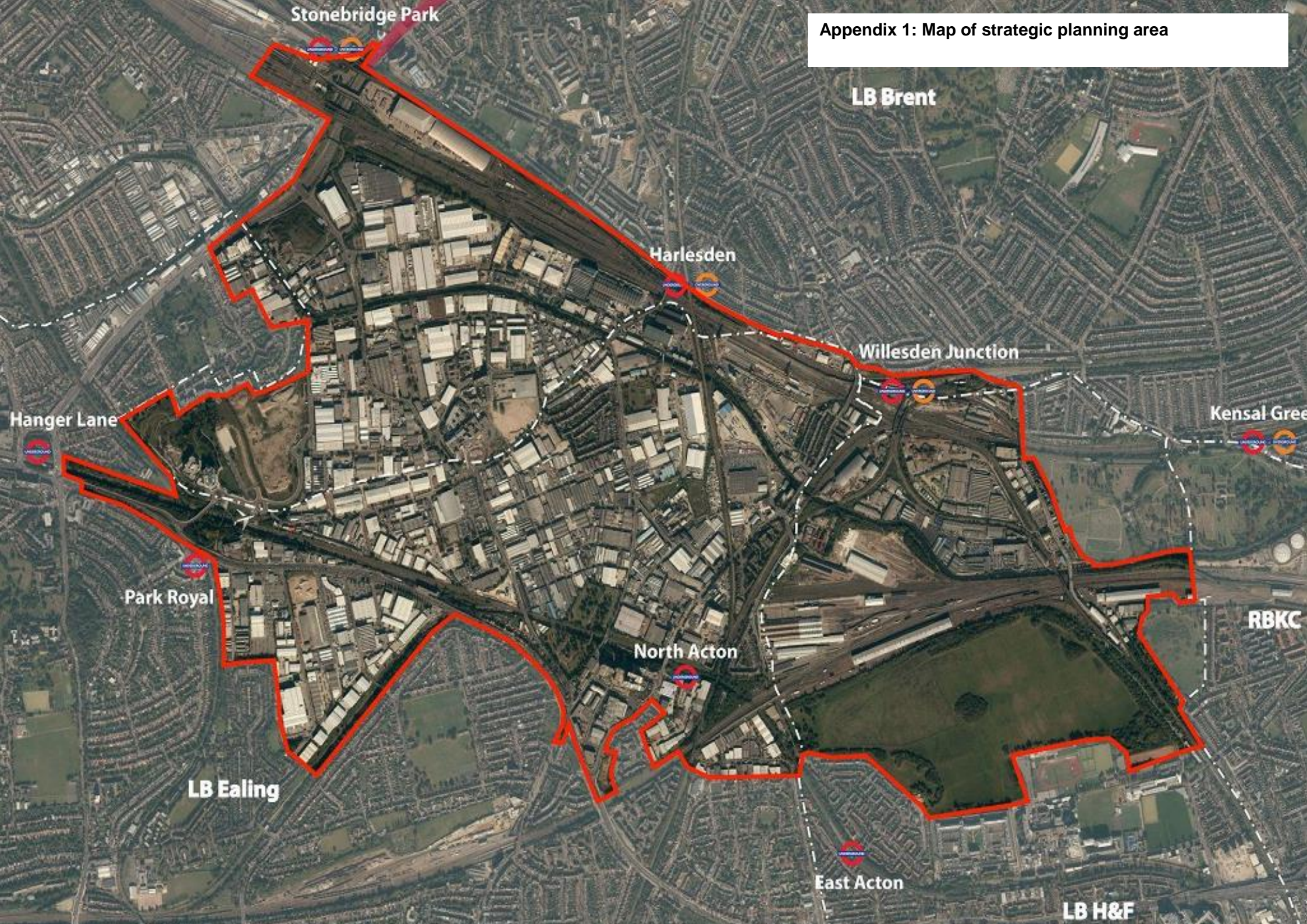
Table 1: Summary of engagement with Duty to Cooperate bodies (up to May 2018)

Category	Organisation	Correspondence sent	Meetings	Correspondence received	Notes	
1	Prescribed body	Environment Agency	✓	✓	✓	Response received confirming DtC activities.
2	Prescribed body	Historic England	✓	✓	✓	Response received confirming DtC activities.
3	Prescribed body	Natural England	✓	✓	✓	
4	Prescribed body	Mayor of London	✓	✓	✓	
5	Prescribed body	Civil Aviation Authority	✓			
6	Prescribed body	Homes and Communities Agency	See Engagement with 4.	See Engagement with 4.	See Engagement with 4.	Response received confirming DtC activities.
7	Prescribed body	NHS Brent CCG	✓	✓	✓	Engagement with the North West London Collaboration of CCGs
8	Prescribed body	NHS Ealing CCG	✓	✓	✓	Engagement with the North West London Collaboration of CCGs
9	Prescribed body	NHS Hammersmith and Fulham CCG	✓	✓	✓	Engagement with the North West London Collaboration of CCGs
10	Prescribed body	NHS West London (incl. RBKC) CCG	✓	✓	✓	
11	Prescribed body	NHS England	✓	See Engagement with 7-10	See Engagement with 7-10	
12	Prescribed body	Transport for London	✓	✓	✓	Response received confirming DtC activities.
13	Prescribed body	Highways England	✓			
14	Prescribed body	The Marine Management Organisation	✓		✓	
15	Prescribed body	The Office of Rail Regulation	✓			
16	Prescribed body	London LEP	✓	✓	✓	Response received confirming DtC activities.

7. Conclusion and next steps

- 7.1. Given the prescribed function of OPDC and the structures in place to facilitate cooperation, robust mechanisms have been put in place to ensure that the Duty to Cooperate is met in the development of the Local Plan. These arrangements will continue to aid on-going cooperation in the implementation of the Local Plan.
- 7.2. On the basis of evidence presented in this Statement and its appendices, OPDC considers that it has fulfilled the duty to cooperate as part of the preparation of the Local Plan. Ongoing engagement is expected and some indicative areas of continued engagement have been identified in Appendix 2.

Appendix 1: Map of strategic planning area



Stonebridge Park

LB Brent

Harlesden

Willesden Junction

Kensal Green

Hanger Lane

Park Royal

North Acton

RBKC

LB Ealing

East Acton

LB H&F

Appendix 2: Duty to Cooperate Activities²

NPPF strategic priority: The homes and jobs needed in the area

Homes

Overview

- A2.1 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:
- SP4
 - H1 - H10
- A2.2 The following supporting studies have been developed which relate to this strategic priority (see Appendix 3):
- OPDC Strategic Housing Market Assessment
 - Affordable Housing Viability Assessment
 - Gypsy and Travellers Accommodation Needs Assessment and Addendum
 - Housing Evidence Statement
 - Development Capacity Study
- A2.3 OPDC has been worked collaboratively with the three host local planning authorities (Brent, Ealing and Hammersmith and Fulham), Kensington and Chelsea and the Greater London Authority (GLA) in developing an understanding of future housing needs through the preparation of the Strategic Housing Market Assessment (SHMA). OPDC commissioned consultants Opinion Research Services (ORS) in September 2015 to prepare a SHMA in order to look at this issue in greater detail.
- A2.4 The SHMA identified the relevant housing market area and provides an analysis of housing market trends, including the current balance between supply and demand. The Study included the following key outputs:
- Current number of households with an unmet housing need.
 - Total future number of households during Local Plan period.
 - Number of households who cannot afford market housing.
 - Analysis of housing mix requirements of the future households.
 - Specific housing requirements such as older people and shared housing.
- A2.5 Importantly, the SHMA identifies the housing market area to be used to assess the Objectively Assessed Needs (OAN) for housing.
- A2.6 Housing Market Areas reflect “the key functional linkages between places where people live and work”. The SHMA first identified the objectively assessed housing need on the land within OPDC’s boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need. Based on this approach and assessing need arising from the area’s current population which is 7,000 people and 2,800 households, the SHMA identified a need for only 1,200 new homes over the Local Plan period (2017 to 2037). However, given the scale of this Mayoral Opportunity Area, it is not considered appropriate to assess housing within OPDC’s boundary alone. Therefore, the SHMA and housing market area has been extended to include the combined area of the London Boroughs of

² This section will be updated regularly to reflect ongoing discussions or to correct/amend as appropriate.

Brent, Ealing and Hammersmith & Fulham. Based on this revised SHMA area, the need is for 99,000 new homes over the Local Plan period (2017 to 2037).

- A2.7 OPDC has been working with Brent, Ealing, Hammersmith and Fulham and the GLA to consider the level of development that can be accommodated in the area, and contributions towards the objectively assessed need (OAN) as far as is consistent with national policies, as set out in the National Planning Policy Framework (NPPF). Projecting forward, the total need identified (99,900 new homes) is likely to be exceeded by a combination of OPDC delivery of 20,100 homes (based on the development capacity for sites in OPDC's area set out in the Development Capacity Study) plus the London Boroughs of Brent, Ealing and Hammersmith & Fulham meeting their respective London Plan housing delivery targets over the next 20 years.
- A2.8 OPDC developed a Development Capacity Study to support the first and second Regulation 19 Revised Draft Local Plans. This meets the requirements of National planning practice guidance for developing a Housing and Economic Land Availability Assessment to define a development capacity for the OPDC area and identifies the capacity for new homes. The SHMA and Development Capacity Study information was shared with the London Boroughs of Brent, Ealing and Hammersmith & Fulham at OPDC Duty to Cooperate meetings.
- A2.9 National planning practice guidance sets out the requirements for local planning authorities to assess the need for traveller sites and plan for an appropriate level of supply. OPDC has complied with this by undertaking such an assessment.
- A2.10 Opinion Research Services (ORS) were commissioned by OPDC in October 2015 to complete a robust and up-to-date needs assessment of accommodation for Gypsies and Travellers to 2031. OPDC's Gypsy and Travellers Accommodation Needs Assessment (GTANA) confirmed that there is one public licensed site at Bashley Road providing 24 pitches within the OPDC area.
- A2.11 The Bashley Road site falls within the London Borough of Ealing but is managed by Oxfordshire County Council. Stakeholder engagement was undertaken with all three local planning authorities (Brent, Ealing and Hammersmith and Fulham) and Oxfordshire County Council. This helped to develop an understanding of the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population across the whole OPDC area and the identified housing market area.
- A2.12 This study used the new planning definition of gypsies and travelling showpeople to identify the need for additional pitch provision over the Local Plan period. The GTANA identified that there is no current need for additional pitches for gypsies and travellers in the area who meet the new planning requirement that they still travel for work.
- A2.13 Hammersmith and Fulham and RBKC are also jointly responsible for a Traveller site at Stable Way and completed a Joint GTANA (December 2016). The Joint RBKC and LBHF GTANA has identified a need for 9 pitches between 2016 to 2030 based on a site outside of OPDC's boundary but helping to meet the needs of gypsies and travellers within LBHF which includes part of OPDC's area. The councils also jointly prepared a framework methodology as part of the Joint RBKC and LBHF GTANA to appraise sites in their areas to meet this need.
- A2.14 RBKC has requested that the need for new pitches is considered as part of the OPDC GTANA, Policy H8 and associated supporting text. They consider that the

policy approach does not reflect the work that LBHF is currently undertaking in respect of identifying sites to help meet need arising in the Joint GTANA and that there are potential opportunities for additional pitch provision to be delivered to assist LBHF to meet its joint Traveller needs. RBKC also state that OPDC has not presented any evidence of a wider call for sites for gypsy and traveller use or undertaken a review of other sources of potential sites.

- A2.15 OPDC's own GTANA identified that there was no need for additional pitches during the Local Plan period, in accordance with guidance on completing GTANAs and the Planning Policy for Traveller Sites (PPTS). In response to RBKC's request, an Addendum to OPDC's GTANA was undertaken to assess the potential for sites within the OPDC area to help to meet the need identified in the Joint LBHF and RBKC GTANA. OPDC's Addendum uses the same methodology to appraise sites as was agreed in the LBHF and RBKC GTANA. OPDC's Addendum concluded that there is no capacity within the OPDC area for additional pitches to meet the needs of the Gypsy and Traveller community and no additional capacity available on the Bashley Road site. This information was shared with RBKC prior to it being published for consultation to allow opportunity for comments. In addition to this, during the consultation on the Regulation 18 draft Local Plan in February 2016, OPDC issued a call for sites capable of contributing towards OPDC's overall housing supply.
- A2.16 There have been discussions and comments about the proposed affordable housing tenure split in OPDC's Local Plan (Policy H2), particularly with regards to the priority given to social rent/London Affordable Rent (LAR). OPDC has discussed these issues with the GLA, Brent, Ealing and Hammersmith and Fulham. OPDC's Affordable Housing Viability Assessment (AHVA) tested a number of development scenarios and affordable housing levels, including an overall target to deliver 35% and 50% affordable housing with a tenure split in each of 30%, 43% and 70% social rent/LAR, with the remainder provided as intermediate housing. This showed that based on current existing use values, likely current/future (non-grown) sales values, construction costs and other costs, only a tenure split of 30% social rent/LAR and 70% intermediate would be viable if OPDC sought to achieve an overall affordable housing target of 50%. OPDC cannot set a policy that does not take account of viability – this would risk the Local Plan being found unsound.
- A2.17 OPDC has, however, sought to make changes to the policy and supporting text in the Local Plan to refer to opportunities to optimise social rent/LAR. In addition to changing the policy and supporting text, OPDC has proactively worked with the boroughs to agree an affordable housing nominations policy which will ensure that local people on the borough's housing waiting lists can be housed in the social rent/LAR and Intermediate homes being delivered in the area as well as providing 10% of homes to help meet pan London housing needs.
- A2.18 To date, the outcome of the engagement activities have led to the successful completion of the SHMA and GTANA and agreement over the definition of a single market area, which covers Brent, Ealing and Hammersmith and Fulham. This led to constructive discussions/briefings on the level of objectively assessed need across the area and what opportunities there are for OPDC to contribute towards meeting these needs. The SHMA and GTANA conclusions have informed policy, which in turn has been shaped through ongoing discussion and constructive feedback with the strategic partners. Early draft policies and responses to key issues arising from consultation were presented for discussion as part of the Duty to Cooperate meetings and have been amended where relevant and appropriate in light of comments received. As such and as evidenced below, OPDC considers that it has engaged

positively with stakeholders in the development of the Local Plan policies, and in trying to reach consensus on the proposed approach to dealing with housing policy matters.

Engagement activities

A2.19 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: Sharing of information, including borough SHMAs and specifications, to help support the preparation of the specification for the OPDC SHMA. The methodology used has been in accordance with government guidance on compiling SHMAs and this has also been used by the boroughs when undertaking their own studies.</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea</p> <p>Comment: Specification for SHMA was prepared taking into account this information, and consultants were successfully appointed.</p> <p>Date: July 2015</p>
<p>Activity: OPDC Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate.</p> <p>Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 housing policies as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Stakeholders invited to comment in advance of formal consultation</p> <p>Date: 18th August 2015, 29th September 2015, 13th October 2015, 10th November 2015</p>
<p>Activity: Interviews with borough officers</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea and Oxfordshire County Council</p> <p>Comment: Gathered information from partners as part of primary research to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the OPDC area. This was used to inform the findings in the report.</p> <p>Date: As described in the GTANA report</p>
<p>Activity: Stakeholder event to present and discuss Draft SHMA</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, OPDC Housing Panel and GLA.</p> <p>Comment: The Comments of the SHMA are shared. DtC Partners involved and stakeholders have an opportunity to ask questions and discuss the emerging Comments of the SHMA.</p> <p>Date: 29th January 2016</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and associated Draft GTANA and SHMA</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: The contents of the GTANA become public. DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the GTANA and housing policies. Information on how representations have been considered is included in the Statement of Consultation.</p>

<p>Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 16th February 2016, 1st March 2016, 15th March 2016, and housing workshop on 17th March 2016</p>
<p>Activity: Review of revised SHMA following consultation on Regulation 18 Draft local Plan. Partners involved: GLA, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: This included revisions to the report as a result of comments received from DtC partners. The most recent GLA population projections were used as agreed by the GLA. Dates: July to September 2016</p>
<p>Activity: Meeting with borough housing officer Partners involved: London Borough of Brent Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 4th August 2016</p>
<p>Activity: Meeting with borough housing officer Partners involved: London Borough of Ealing Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 4th August 2016</p>
<p>Activity: Discussion on key issues raised during Regulation 18 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on Regulation 18 Local Plan key issues, including housing issues. Discussion around OPDC's proposed response Dates: 12th April 2016, 10th May 2016, 30th August 2016, 13th September 2016, 7th March 2017, 30th May 2017, 27th June 2017</p>
<p>Activity: Meeting with borough housing officer Partners involved: West London Housing Strategy Officers Meeting Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 7th September 2016</p>
<p>Activity: Informal engagement on draft Regulation 19 policies as part of regular Duty to Cooperate meetings Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of formal consultation Date: 25th October 2016</p>
<p>Activity: Report and Presentation to OPDC Housing Panel (attended by LB Brent, Ealing and Hammersmith and Fulham and the GLA) on the key issues arising from the Regulation 18 consultation Partners involved: Housing Panel members Comment: Opportunity to discuss key issues related to viability Date: 26th October 2016</p>
<p>Activity: Meeting with borough housing officer Partners involved: London Borough of Hammersmith and Fulham Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 23rd November 2016</p>
<p>Activity: Informal engagement on the draft first Regulation 19 Local Plan Housing policies</p>

<p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham</p> <p>Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received.</p> <p>Date: 10th May 2016, 25th October 2016, 21st March 2017</p>
<p>Activity: Informal consultation on the draft first Regulation 19 Local Plan Housing policy at Mayoral Advisers meeting</p> <p>Partners involved: Greater London Authority</p> <p>Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received.</p> <p>Date: 21st March 2017, 30th May 2017</p>
<p>Activity: Meeting with Greater London Authority</p> <p>Partners involved: Greater London Authority</p> <p>Comment: Review of outputs of Affordable Housing Viability Assessment</p> <p>Date: 22nd March 2017</p>
<p>Activity: Meeting with Greater London Authority</p> <p>Partners involved: Greater London Authority</p> <p>Comment: Review of outputs of Affordable Housing Viability Assessment</p> <p>Date: 3rd May 2017</p>
<p>Activity: Meeting on London's city-wide Strategic Housing Market Assessment</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Greater London Authority</p> <p>Comment: Review of draft outputs from London Strategic Housing Market Assessment, key evidence base for Draft New London Plan</p> <p>Date: 15th May 2017</p>
<p>Activity: OPDC Housing Panel</p> <p>Partners involved: Greater London Authority, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham</p> <p>Comment: Received feedback during consultation on Draft 19 Local Plan policies</p> <p>Date: 12th July 2017</p>
<p>Activity: Meeting with borough housing officer</p> <p>Partners involved: London Borough of Brent</p> <p>Comment: Discussion on proposals for an affordable housing nominations policy</p> <p>Date: 3rd August 2017</p>
<p>Activity: Meeting with borough housing officer</p> <p>Partners involved: London Borough of Ealing</p> <p>Comment: Discussion on proposals for an affordable housing nominations policy</p> <p>Date: 4th August 2017</p>
<p>Activity: Meeting with borough housing officer</p> <p>Partners involved: London Borough of Hammersmith & Fulham</p> <p>Comment: Discussion on proposals for an affordable housing nominations policy</p> <p>Date: 18th August 2017</p>
<p>Activity: OPDC Housing Panel</p> <p>Partners involved: Greater London Authority, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham</p> <p>Comment: Discussion on proposals for an affordable housing nominations policy</p> <p>Date: 13th September 2017</p>
<p>Activity: Meeting with borough housing officers</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham</p> <p>Comment: Discussion on proposals for an affordable housing nominations policy</p> <p>Date: 21st November 2017</p>
<p>Activity: West London SHMA inception meeting</p>

<p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham</p> <p>Comment: Commencement of sub-regional SHMA to which OPDC's SHMA will be updated and contribute to</p> <p>Date: 16th January 2018</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included the Joint Kensington & Chelsea/Hammersmith & Fulham GTANA and the progress the two boroughs had made in identifying sites within their areas to meet the need for additional Gypsy and Traveller pitches.</p> <p>Date: 19th September 2017, 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: OPDC Housing Panel</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Greater London Authority</p> <p>Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, including housing policies, and proposed amendments and next steps.</p> <p>Date: 23rd February 2018</p>
<p>Activity: Informal consultation on GTANA</p> <p>Partners involved: Royal Borough Kensington & Chelsea</p> <p>Comment: Letter setting out how OPDC had used the same methodological approach as taken in the Joint GTANA and that there is no capacity within OPDC's redline boundary for additional pitches.</p> <p>Date: 21 March 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 14th June – 30th July 2018, including duty to cooperate meetings held on 10th July 2018</p>
<p>Activity: OPDC Housing Panel</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Greater London Authority</p> <p>Comment: Attendees briefed on Regulation 19 (2) Local Plan, including the Old Oak North Masterplan, delivering affordable family accommodation that meets identified needs</p> <p>Date: 20th June 2018</p>
<p>Activity: Willesden Junction Steering Group</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Greater London Authority, Transport for London, Network Rail</p> <p>Comment: Attendees discussed potential approaches to optimise housing economic floorspace development delivery and phasing for Willesden Junction area.</p> <p>Date: 13th August 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Attendees briefed on second Regulation 19 Local Plan key issues, including housing issues. Discussion around OPDC's proposed response</p> <p>Date: 21st August 2018</p>

Activity: Meeting with Greater London Authority
Partners involved: Greater London Authority, Transport for London
Comment: Discussion regarding OPDC's affordable housing policy and agreement on proposed amendments.
Date: 21st August 2018 and 3rd September 2018

Ongoing areas of engagement

A2.20 Ongoing work/discussion is likely to cover the following areas:

- The SHMA highlights the anticipated level of housing demand. OPDC is the local planning authority and can therefore plan and facilitate the delivery of housing within its area, but the boroughs remain the local housing authorities for their respective areas. OPDC will work with the local housing authorities to ensure that new housing delivered can help them meet their statutory housing responsibilities. Increasing the housing supply is not just about building new homes on brownfield land. Empty homes can undermine housing supply and negatively impact on residents in the surrounding area.
- OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith and Fulham to agree a joint protocol to work to bring empty properties back into habitable use.
- Ongoing work on updating the OPDC SHMA evidence base through the West London Alliance SHMA programme.
- The Self-build and Custom Housebuilding Act 2015 places a duty on relevant authorities to keep a register of serviced plots of land to build houses upon. Through the Duty to Cooperate, OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to ensure that the area is also meeting the needs of people wishing to self-build or custom-build their own home.
- Continued engagement with London Borough of Ealing as they review options to improve the existing Bashley Road site so that it continues to provide suitable accommodation.
- OPDC will continue to work with the London Boroughs of Brent, Ealing and Hammersmith and Fulham to ensure development capacity of the OPDC area is updated with developments awarding planning permission by the boroughs under any relevant scheme of delegation.

Jobs/Commercial

Overview

A2.21 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- SP5
- E1 – E5

A2.22 The following supporting studies have been developed which relate to this strategic priority (see Appendix 3):

- Park Royal Atlas
- Park Royal Intensification Study
- Future Employment Growth Sectors Study
- Industrial Land Review
- Industrial Estates Study
- Retail and Leisure Needs Study

- A2.23 The Park Royal Industrial Estate is London's largest industrial estate and a vital cog in the London economy. The OPDC area accommodates 1,700 businesses which employ around 43,100 people and generate 2.1 billion in Gross Value Added to the UK economy. Given its local and wider significance, OPDC is planning to protect, intensify and strengthen the role of Park Royal as a Strategic Industrial Location.
- A2.24 Alongside a protected and strengthened Park Royal, the OPDC area has the capacity to deliver a minimum 40,400 jobs in the next 20 years of the Local Plan. This development potential could bring enormous rewards for the national, regional and local economy, generating billions in Gross Value Added (GVA). The number of new jobs delivered would also provide opportunities for lifelong learning and employment across a range of skills and sectors for the residential communities in the area, including existing residents and up to 60,000 new residents within OPDC's boundary, as well as other communities in the surrounding boroughs.
- A2.25 Currently a considerable number of employees either live within or in suburbs adjacent to OPDC's area. Within a 5km radius, the majority of employees travel from Brent (approximately 60%) and Ealing (approximately 30%). Housing Market Areas also reflect "the key functional linkages between places where people live and work". The SHMA housing market area includes the 3 host boroughs, so this geography is also relevant to understanding the local labour market.
- A2.26 OPDC has been engaging partners to develop the economic policies and strategy for the area. The boroughs are key stakeholders which influence the economic market in OPDC's area, including contributions to the overall supply of industrial/employment land and therefore influence local supply and demand as well as being a key source of local labour.
- A2.27 Ealing Council has highlighted the need for OPDC to take more of a lead on intensification starting with some suggestion of where in particular it may occur. They refer to the opportunity for further detailed planning work on the development and management of Park Royal and continuing co-operation with OPDC on this as a fundamental cross-boundary issue.
- A2.28 Emerging Park Royal place policies were discussed at Duty to Cooperate meetings. In addition to this, OPDC amended the Plan at the second Regulation 19 stage to clarify how policies will facilitate the delivery of intensification. New industrial site allocations were identified and published for consultation as well as a new supporting study – the Park Royal Development Framework Principles. OPDC acknowledge that other sites identified in the Park Royal Intensification Study or windfall sites could also contribute towards intensification and policy E1 would support this. OPDC has also committed to preparing a Park Royal Supplementary Planning Document (SPD) to provide additional guidance where necessary, so ongoing engagement with Ealing Council on this issue is expected to continue through this work.
- A2.29 Brent Council have raised soundness issues related to the approach for affordable workspace and changes of use but these are detailed, non strategic matters. In accordance with E3, an appropriate quantum of affordable workspace would be assessed on a case by case basis. This provides flexibility to determine the most suitable approach as, in some cases, the delivery of small business units may be more appropriate. OPDC may consider providing more detail on implementing this policy as part of preparing an Affordable Workspace SPD. An SPD could be updated more regularly than a Local Plan document.

A2.30 To date, engagement activities have led to the successful completion of evidence base documents (listed above). The conclusions from the evidence base have informed policy development, which has also been subject to ongoing discussion and constructive feedback with the strategic partners. Early draft policies were presented for discussion and have been amended where relevant and appropriate in light of comments received. As such and as evidenced below, OPDC considers that it has engaged positively with stakeholders in the development of the Local Plan employment policies.

Engagement activities

A2.31 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015-ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 employment policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 18th August 2015, 27th October 2015</p>
<p>Activity: Stakeholder workshops on the Future Employment Growth Sectors Study Partners involved: GLA, London Borough of Brent, West London Alliance, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: The emerging findings were shared with partners. DtC partners and stakeholders have an opportunity to provide comments. Date: 29th July 2016</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and associated Draft Industrial Land Review (ILR) and Development Capacity Study Partners involved: For details on who was consulted please see Statement of Consultation. Comment: The contents of the ILR and projected number of jobs and employment sites become public as part of the Development Capacity Study. DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the ILR and employment policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an Employment focussed workshop on 3rd March 2016</p>
<p>Activity: Stakeholder workshops on the Future Employment Growth Sectors Study Partners involved: GLA, London Borough of Hammersmith and Fulham Comment: The emerging recommendations were shared with partners. DtC partners and stakeholders have an opportunity to provide comments. Date: 3rd October 2016</p>
<p>Activity: Discussion on key issues raised during Regulation 18 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on Regulation 18 Local Plan key issues, including employment issues. Discussion around OPDC's proposed response</p>

<p>Dates: 12th April 2016, 10th May 2016, 30th August 2016, 13th September 2016, 7th March 2017, 30th May 2017, 27th June 2017</p>
<p>Activity: Informal engagement on draft first Regulation 19 Local Plan Employment policies as part of regular Duty to Cooperate meetings Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received. Date: 25th October 2016, 21st March 2017</p>
<p>Activity: Park Royal Intensification workshop Partners involved: London Borough of Ealing Comment: Opportunity to comment on emerging findings of the Study in order to help shape recommendations Date: 4th April 2017</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 29th June – 11th September 2017. Overview of employment policies given to attendees of DtC project meeting on 8th August 2017.</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included employment policies. Date: 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: Informal meeting with GLA officer on London Economic Action Partnership (LEAP) Partners involved: GLA Comment: Shared update on OPDC Local Plan and received update on LEAP work programme. Date: 15th March 2018</p>
<p>Activity: West London Employment Land Review led by LBE and LBB Partners involved: London Borough of Brent, London Borough of Ealing Comment: Feedback given on the scope, methodology and findings of the study based on relevant completed OPDC studies. Date: 30th April 2018, 18th June 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation. Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19</p>

Comment: Attendees briefed on Regulation 19 (2) Local Plan key issues, including housing issues. Discussion around OPDC's proposed response
Date: 21st August 2018

Activity: Joint evidence base on Affordable Workspace
Partners involved: West London Alliance (Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow)
Comment: OPDC involved in developing brief for developing joint evidence base on Affordable Workspace
Date: August 2018

See also activities under *NPPF strategic priority: The provision of retail, leisure and other commercial development*

Ongoing areas of engagement

A2.32 Ongoing areas of work include:

- Engaging with the London Boroughs of Brent and Ealing and other partners to prepare the Park Royal SPD.
- Engaging with WLA authorities to develop shared evidence base on affordable workspace and potential for Affordable Workspace SPD
- working with the surrounding boroughs to develop an approach to securing local labour, skills and employment contributions and the implementation and ongoing review of relevant delivery mechanisms.

NPPF strategic priority: The provision of retail, leisure and other commercial development

Overview

A2.33 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- SP5, SP6
- TCC1 – TCC5

A2.34 The following supporting studies have been developed which relates to this strategic priority (see Appendix 3):

- Retail and Leisure Needs Study and Addendum
- Healthy Town Centres Study
- Sports Courts and Swimming Pools Study
- Cultural Principles
- Catalyst Uses Study
- Park Royal Development Framework Principles
- Old Oak North Development Framework Principles

A2.35 The current development plan as it applies to the OPDC area lays the foundations for new town centres to be provided as part of the large-scale comprehensive regeneration of Old Oak and Park Royal. At the heart of this is the principle articulated in the OAPF that the new town centres should meet the needs of the development, whilst having regard to the role and function of the existing hierarchy of centres.

A2.36 OPDC has been working with a wider range of partners who have been identified based on the potential catchment of the new town centre. Key partners have included

London Borough of Brent, London Borough of Ealing, Hammersmith & Fulham Council, Royal Borough of Kensington and Chelsea and the GLA. The Old Oak and Park Royal Retail and Leisure Needs Study (RLNS) has been developed in close cooperation with these partners.

- A2.37 The quantitative analysis in the RLNS has identified the need for 64,500 sqm (gross) floorspace during the plan period, arising from a combination of future resident and worker expenditure, as well as inflow expenditure to the OPDC area, primarily driven by the new transport interchange. The impact of this quantum of floorspace on existing centres, including the nearby centres in the surrounding boroughs, has been assessed. It is considered that based on current forecasts the impacts of this scale of development in the OPDC area will be within the bounds of acceptability. There are also opportunities to harness benefits arising from the development in the OPDC area for existing centres.
- A2.38 Brent Council have commented on the approach to mitigating the impact on Harlesden town centre. OPDC has assessed the impact on Harlesden as part of the Retail and Leisure Needs Study. Measures to help mitigate any potential impacts to the Harlesden town centre have been incorporated into the Plan and clarified. Changes to the policy have been developed in discussion with London Borough of Brent.
- A2.39 To date, engagement activities have led to the successful completion of evidence base documents. The conclusions from the RLNS have informed policy development, and policies been subject to ongoing discussion and constructive feedback with the strategic partners. Early draft policies were presented for discussion and have been amended where relevant and appropriate in light of comments received. The policy has been refined throughout the process to try to address specific issues raised by Brent Council.

Engagement activities

- A2.40 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Joint project working group established for the production of the Retail and Leisure Needs Study Partners involved: London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, Royal Borough of Kensington and Chelsea Comment: RLNS methodology and study progressed through discussion and co-operation Dates: 22nd May 2015</p>
<p>Activity: Joint project working group established for the production of the Retail and Leisure Needs Study Partners involved: Royal Borough of Kensington and Chelsea Comment: RLNS methodology and study progressed through discussion and co-operation Dates: 9th June 2015</p>

<p>Activity: Joint project working group meeting for the production of the Retail and Leisure Needs Study</p> <p>Partners involved: London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, Royal Borough of Kensington and Chelsea</p> <p>Comment: RLNS methodology and study progressed through discussion and co-operation</p> <p>Dates: 16th July 2015</p>
<p>Activity: Joint project working group meeting for the production of the Retail and Leisure Needs Study</p> <p>Partners involved: London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, Royal Borough of Kensington and Chelsea</p> <p>Comment: RLNS methodology and study progressed through discussion and co-operation</p> <p>Dates: 17th August 2015</p>
<p>Activity: Informal engagement on draft Regulation 18 town centre policies as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Stakeholders invited to comment in advance of consultation</p> <p>Date: 1st September 2015, 14th September 2015</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and associated RLNS and Development Capacity Study</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: The contents of the RLNS and projected number of jobs and employment sites become public as part of the Development Capacity Study. DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Brent, Ealing and Royal Borough of Kensington and Chelsea commented on retail related matters. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including a Community Infrastructure workshop on 13th February 2016</p>
<p>Activity: Informal engagement on first draft Regulation 19 policies as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received.</p> <p>Date: 10th May 2016, 13th September 2016, 8th November 2016, 7th March 2017, 21st March 2017</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 29th June – 11th September 2017. Overview of Town Centre policies given to attendees of DtC project meeting on 8th August 2017.</p>
<p>Activity: Meetings with Brent officers to discuss Harlesden Town Centre Enhancement Strategy</p> <p>Partners involved: London Borough of Brent</p> <p>Comment: Discussion on the scope for and text for inclusion in the Local Plan in respect of Harlesden. Site tour of Harlesden to understand priorities for the centre.</p> <p>Date: 1st December 2017, 23rd February 2018, 12th July 2018</p>

Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings
Partners involved: see paragraph 3.19
Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these.
Date: 19th September 2017, 31st October 2017, 23rd January 2018, 12th June 2018

Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies
Partners involved: For details on who was consulted please see Statement of Consultation.
Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation.
Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018

Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings
Partners involved: see paragraph 3.19
Comment: Attendees briefed on second Regulation 19 Local Plan key issues, including housing issues. Discussion around OPDC's proposed response
Date: 21st August 2018

Ongoing areas of engagement

A2.41 OPDC will be working with Brent Council with regards to securing the submission of Harlesden Enhancement Strategies.

NPPF strategic priority: The provision of infrastructure for waste management

Overview

- A2.1 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:
- EU6 – EU7
- A2.2 The following supporting studies have been developed which relates to this strategic priority (see Appendix 3):
- Waste Apportionment Study
 - Waste Technical Paper
 - Waste Management Strategy
 - Waste Guidance for High Density Development
- A2.3 There are a number of waste sites located in within the London Boroughs of Brent, Ealing and Hammersmith & Fulham which now fall within the boundary of the Old Oak and Park Royal Development Corporation (OPDC).
- A2.4 As well as being a Local Planning Authority (LPA), OPDC is a Waste Planning Authority (WPA) for the area and is therefore responsible for preparing a waste local plan either individually or as part of a joint plan. OPDC does not have an apportionment target in the London Plan but, where a Mayoral Development Corporation (MDC) exists or is established within a borough, the MDC is required to Cooperate with the borough to ensure that their apportionment requirements are met. OPDC has therefore been working with the GLA and the London Boroughs of Brent,

Ealing and Hammersmith & Fulham to deliver a comprehensive and integrated approach to waste management. A key area of focus has been on working in partnership to clarify OPDC's approach to supporting boroughs to meet their waste management apportionments.

- A2.5 OPDC acknowledges that planning for waste is a key issue and has therefore been working with a number of waste planning authorities, not just the 3 host boroughs, in order to identify sustainable solutions for waste management across the area.
- A2.6 Key partners have been identified based on waste disposal authority areas, or because of the significant role they play in strategic waste policy development and/or regulation, including but not limited to:
- West London Waste Plan boroughs (Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames)
 - Western Riverside Waste Authority planning authorities (Royal Borough of Kensington & Chelsea, Hammersmith & Fulham, Lambeth and Wandsworth)
 - GLA
 - Environment Agency
- A2.7 OPDC also participates in the London Waste Planning Forum so that updates on OPDC's Local Plan can be discussed in wider group of local authority representatives, including authorities outside of London.
- A2.8 Some of the waste sites in the Old Oak area are going to be subject to transformational change and redevelopment in order to deliver new homes and jobs. OPDC has been working in partnership and consulted waste planning authorities to try to understand the implications of this and how this might affect waste management capacity across the area. This has resulted in co-operation to adopt the West London Waste Plan and evidence base to demonstrate that there will be sufficient capacity and sites available to manage waste.
- A2.9 OPDC worked jointly with the London Boroughs of Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames (all constituent boroughs of the West London Waste Authority) to prepare the West London Waste Plan (WLWP). The WLWP:
- details the estimated amounts for the different types of waste that will be produced in West London up to 2031;
 - identifies and protects the current sites to help deal with that waste, including two sites within the OPDC that are safeguarded for waste use;
 - identifies the shortfall of capacity needed over the life of the Plan (to 2031); and
 - allocates a set of sites to meet the shortfall which are preferred for waste related development.
- A2.10 Successful co-operation on this led to the WLWP being adopted as part of OPDC's Local Plan. More recently, Ealing Council have highlighted the impact of the new Draft London apportionment targets. In response to this, OPDC's Local Plan has amended text in the Local Plan to explain the potential need for a future review of waste policy if changes are required in order to help host boroughs to meet higher waste apportionment targets.
- A2.11 OPDC agreed to work with Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth (all constituent boroughs of the Western Riverside Waste authority) to prepare a joint waste technical paper. The purpose of this work was to provide an up-to-date waste evidence base to support boroughs to meeting their respective waste apportionment

targets. This work has also helped to identify waste imports and exports to other waste planning areas.

- A2.12 The Waste Technical Paper identifies the Old Oak Sidings (Powerday) site as a key site capable of meeting the apportionment target for LBHF. It also showed a gap in waste capacity for Lambeth, Kensington and Chelsea and Wandsworth for both apportioned waste and non apportioned (Construction, Demolition and Excavation) waste. Optimising the use of the Powerday site generate surplus capacity relative to apportionment which is the subject of ongoing discussion with the Western Riverside Waste authority (WRWA) waste planning boroughs.
- A2.13 The WRWA WPAs have jointly carried out engagement including writing to Waste Planning Authorities who were identified in the draft Waste Technical Paper as importing and exporting waste from the WRWA area in respect of waste planning. Further to this waste planning authorities were also consulted on the Local Plan.
- A2.14 Joint responses from Lambeth, Wandsworth and Kensington and Chelsea Councils have been received which raises specific issues with regards to the duty to cooperate (please refer to full response – Regulation 19(1) respondent 47 and Regulation 19(2) respondent 238). They consider that Powerday and EMR sites would contribute significantly to meeting their unmet need. Lambeth, Wandsworth and Kensington and Chelsea Councils wish to pool apportionments, arisings and available capacity for all waste streams across the WRWA area and formalise an agreement through a Memorandum of Understanding. They state that:
- OPDC has not taken into account the findings of the Waste Technical Paper.
 - OPDC has resisted committing to pooling apportionment targets and capacity with the Western Riverside WPAs and cooperate on this matter.
 - the strategy for waste is an impediment to joint waste planning across the WRWA area.
- A2.15 OPDC considers that it has been working positively with LBHF, RBKC and WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the commissioning and preparation of joint evidence base in the form of the WRWA Waste Technical Paper, officer meetings and with regards to updates on the Powerday capacity assumptions. The new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, OPDC remain committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.

Engagement activities

- A2.16 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

Activity: OPDC approval to adopt the West London Waste Plan

<p>Partners involved: Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames</p> <p>Comment: OPDC accepted as an equal partner in the WLWP, including the identification of two waste sites in its area. OPDC's commitment to implementing a joint waste plan was confirmed through its adoption as part of OPDC's Local Plan. This Comment demonstrates OPDC's contribution towards helping Brent and London Borough of Ealing meet their waste apportionment targets.</p> <p>Date: 28th July 2015</p>
<p>Activity: OPDC Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate.</p> <p>Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 policies as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Stakeholders invited to comment in advance of consultation</p> <p>Date: 29th September 2015, 24th November 2015</p>
<p>Activity: WRWA WPA Waste Apportionments Engagement Statement</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth</p> <p>Comment: OPDC agree to work with the Western Riverside waste planning group to consider waste matters.</p> <p>Date: December 2015</p>
<p>Activity: Formal consultation on the draft Regulation 18 Local Plan and Waste Strategy</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: Information on how representations have been considered is included in the Statement of Consultation. Key issues raised include the approach to existing waste sites</p> <p>Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including an Environment workshop on 10th March 2016</p>
<p>Activity: Agreement on the brief to commission a joint WRWA WPA Waste Technical Paper</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: OPDC accepted as an equal partner in the study and all boroughs involved confirmed full involvement in the project.</p> <p>Date: 19th July 2016</p>
<p>Activity: Officer meeting of WRWA WPA group to discuss appointment of consultants</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: Antithesis commissioned to carry out the WRWA Waste Technical Paper</p> <p>Date: August 2016</p>
<p>Activity: Officer steering group to progress the WRWA WPA Waste Technical Paper</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: Drafts of the Waste Technical Paper were agreed through discussion and co-operation.</p> <p>Date: September 2016 (inception meeting), November 2016 (Draft Report stage), January 2017</p>
<p>Activity: Joint engagement on the WRWA Waste Technical Paper</p>

<p>Partners involved: North London Waste Plan, Environment Agency, RB Kensington and Chelsea, City of London, LB Hammersmith & Fulham, SEWPAG & EoEWTAB, LB Richmond, LB Lambeth, LB Haringey, LB Lewisham, LB Ealing, LB Hillingdon, GLA. Western Riverside Waste Authority (WRWA), LB Barnet</p> <p>Comment: Presentation to London Waste Planning Forum and letter sent to relevant waste planning authorities. Waste planning authorities invited to comment on findings of the WRWA Waste Technical Paper, including information on main waste imports and exports between different areas.</p> <p>Date: 25th January 2017, May 2017</p>
<p>Activity: WRWA WPAs / GLA Meeting on Waste Technical Paper</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth, GLA</p> <p>Comment: Discussed approach in the Waste Technical Paper with the GLA. GLA commented on Powerday capacity assumptions. OPDC to initiate discussions with Powerday Operators.</p> <p>Date: 3rd February 2017</p>
<p>Activity: Informal engagement on first Regulation 19 Local Plan as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Draft policies were shared with officers. Relevant and appropriate amendments were made to the draft policies in light of comments received.</p> <p>Date: 7th February 2017</p>
<p>Activity: WRWA WPAs Draft Memorandum of Understanding</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: Ongoing discussions about joint work arrangements including a draft Memorandum of Understanding. Comments were sought on draft version of MoU</p> <p>Date: March 2017</p>
<p>Activity: WRWA WPAs Revised Draft Memorandum of Understanding</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: RBKC circulated a revised draft Memorandum of Understanding seeking agreement on pooling of capacity and apportionments.</p> <p>Date: June 2017</p>
<p>Activity: Formal consultation on the draft first Regulation 19 Local Plan and associated evidence base</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the waste policies. Information on how representations have been considered is included in the Statement of Consultation. Comments received from RBKC, LBL and LBW in relation to pooling apportionment.</p> <p>Date: 29th June – 11th September 2017. Overview of Environment policies discussed at DtC project meeting on 22nd August 2017.</p>
<p>Activity: WRWA WPAs meeting</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: Discussed revised draft Memorandum of Understanding and approach to updating assumptions for Powerday site.</p> <p>Date: 18 July 2017</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p>

<p>Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included environment policies.</p> <p>Date: 19th September 2017, 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: Shared updates to Powerday assumptions</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, RBKC</p> <p>Comment: Relevant and appropriate amendments were made in light of comments received.</p> <p>Date: August - December 2017</p>
<p>Activity: WRWA WPAs / GLA Meeting</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth, GLA</p> <p>Comment: Main areas of discussion included the updated Powerday capacity assumptions and new Draft London Plan.</p> <p>Date: 8 December 2017</p>
<p>Activity: WRWA WPAs meeting</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: Discussed progress on Local Plans and next steps and OPDC's position on pooling apportionment</p> <p>Date: 13 March 2018</p>
<p>Activity: Response sent to RBKC regarding Local Plan Examination</p> <p>Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth.</p> <p>Comment: To confirm updates on OPDC's position on pooling apportionment</p> <p>Date: 29th January 2018, 15th March 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation. Comments received from RBKC, LBL and LBW in relation to pooling apportionment.</p> <p>Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Attendees briefed on Regulation 19 (2) Local Plan key issues. Discussion around OPDC's proposed response</p> <p>Date: 21st August 2018</p>
<p><i>The London Borough of Hammersmith and Fulham Council Duty to Cooperate Statement (February 2017) provides some information on the engagement which has taken place to inform the development of the strategic waste policy, including activities which involve the OPDC.</i></p> <p><i>London Waste Planning Forum meetings</i></p>

Ongoing areas of engagement

A2.17 Ongoing co-operation is anticipated between OPDC and relevant boroughs to undertake further work to establish if the two host boroughs with increased

apportionments can meet the increased requirement within their area. Engagement will also continue with the Western Riverside grouping.

NPPF strategic priority: The provision of infrastructure for transport

A2.18 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- SP1
- SP7
- T1-T9

A2.19 The following supporting studies have been developed which relates to this strategic priority (see Appendix 3):

- Old Oak Strategic Transport Strategy
- Park Royal Transport Strategy
- Willesden Junction Station Feasibility Study
- North Acton station study
- Old Oak and Park Royal Construction and Logistics Strategy
- Walking, Cycling and Public Realm Study
- Old Oak Bus Strategy
- A40 Study
- Car Parking study

A2.20 Transport for London (TfL) and the Department for Transport are the organisations responsible for identifying the requirements for, and delivering, new strategic transport infrastructure within the OPDC area. They have been leading on plans for two new potential London Overground stations and the new High Speed rail station.

A2.21 TfL is a prescribed body under the Duty to Cooperate and therefore TfL has a duty to cooperate with local planning authorities, such as OPDC, on relevant strategic transport matters (see paragraphs 4.17-4.21). HS2 Ltd is an executive non-departmental public body, sponsored by the Department for Transport. It is responsible for developing and promoting the new High Speed rail station in Old Oak, which received Royal Assent on 23rd February 2017 (The High Speed Rail (London – West Midlands) Act 2017).

A2.22 Both TfL and HS2 Ltd play a critical role in delivering infrastructure which will support the development of Old Oak, so OPDC has been working collaboratively with these organisations to provide updates on the proposals for Old Oak and Park Royal and to ensure that work led by TfL and HS2 is developed in line with the vision in OPDC's Local Plan.

A2.23 To effectively understand and mitigate local transport impacts, separate Old Oak and Park Royal Transport strategies have been prepared. In addition to this, more detailed strategies have been developed, focusing on Willesden Junction and North Acton stations; bus improvements; construction logistics; walking, cycling and the public realm.

A2.24 The range of stakeholders that have been involved in producing these strategies includes TfL and the 3 host boroughs – London Borough of Hammersmith & Fulham, London Borough of Brent and London Borough of Ealing. These key partners have been identified based on the significant role they play in transport strategy and/or as infrastructure providers and their statutory responsibilities as the highway authorities in the OPDC area.

A2.25 Key issues raised through the engagement include:

- Walking and cycling routes
- Bus provision
- Station/line enhancements and new London Overground stations
- Depots and the operational infrastructure requirements for transport services
- Overstation development
- Coach facilities
- Car parking

A2.26 Collaborative working and knowledge sharing has taken place to agree the principles/recommendations for the movement network for Old Oak and Park Royal and develop a comprehensive evidence base for the transport policies within the Local Plan. TfL has been heavily involved in steering groups for transport related supporting studies and has directly authored some.

A2.27 Changes to the policy have been developed in discussion with the host boroughs and TfL and this has helped to address most of the issues raised throughout the engagement activities. Significant changes have involved the phasing of development around operational rail infrastructure/depots. As such, OPDC considers that it has engaged constructively, actively and on an ongoing basis on this issue in accordance with the duty to cooperate.

Engagement activities

A2.28 A list of activities is set out below:

<p>Activity: Engagement on OPDC's Park Royal Transport Study Partners involved: See Appendix 3 Comment: Jointly commissioned by the OPDC and TfL. Workshops held with partners to develop an agreed vision, objectives and to score for interventions for Park Royal's transport network. Given the importance of the A40 in providing connections to the motorway network, Heathrow airport and Central London, representatives from the OPDC and TfL were formed into the A40 Study stakeholder working group. Date: July 2015 - January 2016</p>
<p>Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 transport policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 13th October 2015</p>
<p>Activity: Regular meeting with TfL to discuss emerging findings and resolve issues Partners involved: see paragraph 3.19 Comment: An opportunity to discuss emerging findings and resolve key issues relating to the Local Plan. Changes were made to the Local Plan where relevant and appropriate. Dates: Early 2016 to current day</p>

<p>Activity: OPDC participation in meetings organised by Transport for London to progress the Bus strategy Partners involved: TfL Comment: Sharing of information with TfL to help support the preparation of the bus strategy. Date: January 2016 to March 2017</p>
<p>Activity: OPDC participation in meetings organised by Transport for London to progress the A40 study Partners involved: TfL Comment: Sharing of information with TfL to help support the preparation of the A40 study. Date: January 2016 to August 2016</p>
<p>Activity: OPDC part of client and stakeholder group helping to steer the North Acton Station Feasibility Study Partners involved: See Appendix 3 Comment: TfL, OPDC and the London Borough of Ealing commissioned a feasibility study to investigate the impact of developments on North Acton Station, and to develop proposals to respond to these. Date: Jan 2016 – May 2018</p>
<p>Activity: Working in partnership on a Construction and Logistics Strategy. Partners involved: TfL, London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing Comment: Sharing of information with TfL to help develop the specification for, and completion of, the Construction and Logistics Strategy. Date: January 2016 to May 2018</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and associated supporting studies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DfC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including a Transport workshop on 7th March 2016</p>
<p>Activity: OPDC part of client and stakeholder group helping to steer the Willesden Junction Station Feasibility Study Partners involved: See Appendix 3 Comment: TfL, OPDC and the London Borough of Brent commissioned a GRIP 2 Feasibility Study to investigate the impact of these developments on Willesden Junction Station and Interchange, and to develop proposals to respond to these. As part of the project, OPDC helped evaluate options and information was shared with wider stakeholders via the OPDC Strategic Transport Panel and OPDC Place Review. Date: April 2016 – April 2017</p>
<p>Activity: OPDC part of steering group to progress the Old Oak Strategic Transport Strategy Partners involved: See Appendix 3 Comment: This study was undertaken by Transport for London, with partners and in consultation with HS2 Ltd and Network Rail. It considers the transport impacts of an additional 24,000 homes and 55,000 jobs being provided at Old Oak Common. OPDC's role focussed on working in partnership to share information and develop/refine the methodology and options. Date: TfL organised weekly meetings to discuss progress with stakeholders including OPDC</p>

<p>Activity: Engagement on OPDC's Walking, Cycling and Public Realm Study Partners involved: See Appendix 3 Comment: Jointly commissioned by the OPDC and TfL - makes a series of recommendations for the creation of a coherent and resilient street network and public realm for Old Oak and Park Royal, from a walking, cycling and public realm perspective. As part of the project, OPDC helped evaluate options and shared updates on the progress of the work and opportunity for questions and discussion Date: May 2016, November 2016, February 2017</p>
<p>Activity: Informal engagement on draft Regulation 19 policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received. Date: 10th May 2016, 13th September 2016, 11th October 2016, 6th December 2016, 7th March 2017, 21st March 2017</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 29th June – 11th September 2017. Overview of Transport policies given to attendees of DtC project meeting on 25th July 2017.</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included transport policies. Date: 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation. Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on Regulation 19 (2) Local Plan key issues, including housing issues. Discussion around OPDC's proposed response Date: 21st August 2018</p>

Ongoing areas of engagement

A2.29 OPDC is the local planning authority and can therefore plan for and help facilitate the delivery of transport proposals within its area, but the local borough councils remain the local highway authorities for their respective areas. OPDC will work with the local highway authorities on relevant matters.

NPPF strategic priority: The provision of infrastructure for telecommunications

A2.30 New telecommunications infrastructure will be developed wholly within OPDC area's and delivered in tandem with development. It is not considered to be a cross boundary matter or an issue which will have a significant impact. Therefore, this is not considered to be a key issue which needs detailed consideration as part of this paper.

NPPF strategic priority: The provision of infrastructure for water supply, waste water, flood risk and coastal change management

Overview

A2.31 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- EU3

A2.32 The following supporting studies have been developed which relates to this strategic priority (see Appendix 3):

- Integrated Water Management Strategy
- Utilities Study
- Environmental Standards Study

A2.33 The growth proposed for the Old Oak and Park Royal Opportunity Area is of such considerable scale that it will require a step change in the provision of water supply, wastewater treatment and water infrastructure. The range of challenges include an acute lack of capacity within the drainage infrastructure, areas of surface water and sewer flooding risk locally and in neighbouring areas outside of OPDC's boundary, and an increasing deficit of available water to meet demand. The growth across all Opportunity Areas sharing the same drainage and water supply infrastructure has the potential to impact on this.

A2.34 Within the context of these constraints, several water management measures were considered and developed, and this process included input from a range of stakeholders with an influence on how water will be managed and used in the area. OPDC has been engaging with the following key partners as they have statutory responsibilities for water management as flood authorities:

- Environment Agency;
- London Borough of Brent;
- London Borough of Hammersmith and Fulham (LBHF);
- London Borough of Ealing;
- Royal Borough of Kensington and Chelsea
- Natural England

A2.35 In addition, OPDC have been cooperating with Thames Water as the statutory undertaker for the water and sewage infrastructure.

A2.36 All partners have worked together in developing an evidence base supporting a shared position on the standards in relation to water utilities infrastructure. The starting point is a shared understanding about the current situation. There is no capacity within the network for surface water drainage and development needs to achieve greenfield run-off rates. To achieve this, a range of options have been

explored through the evidence base and OPDC's Local Plan includes a drainage hierarchy to help achieve these rates.

- A2.37 Thames Water highlighted issues regarding the detailed requirements for achieving greenfield run off rates, but it was considered that this was an inappropriate level of detail for inclusion in a Local Plan
- A2.38 Hammersmith and Fulham and Kensington and Chelsea raised concerns with OPDC's proposed sustainable drainage hierarchy in Policy EU3, in particular perceived inconsistencies with the London Plan. However, OPDC considers that the hierarchy has been established in response to the specific context and constraints of the OPDC area and future planned development, and that it complies with the London Plan requirement to manage storm water as close to source as possible.
- A2.39 The Local Plan policies and evidence base has been developed in discussion with the relevant boroughs, the EA and Natural England and this has helped to address the more significant issues raised throughout the engagement activities. The list of activities below demonstrates that OPDC has engaged constructively, actively and on an ongoing basis on this issue.

Engagement activities

- A2.40 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: Meeting of the Integrated Water Management Strategy (IWMS) working group Partners involved: GLA; Thames Water Utilities Ltd; Environment Agency; London Borough of Brent: LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea. Comment: The main high level aims of the IWMS were identified and agreed through consultation with the Steering Group Date: 23rd July 2015</p>
<p>Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 14th September 2015, 29th September 2015, 24th November 2015</p>
<p>Activity: Meeting of the Integrated Water Management Strategy (IWMS) working group Partners involved: GLA; Thames Water Utilities Ltd; Environment Agency; LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea. Comment: The main high level aims of the IWMS were identified and agreed through consultation with the Steering Group Date: 22nd September 2015</p>
<p>Activity: Integrated Water Management Strategy (IWMS) Options Workshop Partners involved: GLA; Thames Water Utilities Ltd; Environment Agency; LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea, Canal and River Trust</p>

<p>Comment: Options in IWMS discussed with stakeholders. Date: 12th November 2015</p>
<p>Activity: OPDC commissioned Thames Water to prepare a Network Impact Assessment as part of Stage 2 Utilities Study Partner: Thames Water Comment: Work was developed to establish the extent of reinforcement works that will be required to accommodate the additional potable water demand of the development. Water recycling options have been identified and appraised, in order to establish the preferred method of reducing the impact of the development on the existing water resources by reducing potable water demand. Date:</p>
<p>Activity: Verifying data with Thames Water as part of Stage 2 Utilities Study Partner: Thames Water Comment: Thames Water has been consulted to verify the reduction in peak surface water discharge rate that will be required to create capacity with the existing combined sewer network, to accommodate additional foul flows generated by the development. Preliminary calculations have also been prepared to estimate the volume of attenuation storage that will be required within each sub-catchment of the site to achieve the required reduction in surface water runoff. Date: Completed and incorporated as part of the Integrated Water Management Study</p>
<p>Activity: Working with Canal and River Trust on Discharge Assessment as part of Stage 2 Utilities Study Partner: The Canal and River Trust Comment: CrT commissioned to produce a Discharge Assessment to establish the feasibility of discharging surface water to the Grand Union Canal, in order to reduce the volume of surface water entering the combined sewer system that will require treatment at the Beckton Sewage Treatment Works. Date: Completed and incorporated as part of the Integrated Water Management Study</p>
<p>Activity: Formal consultation on the Regulation 18 and emerging Environment policies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Kensington and Chelsea, Canal and River Trust, Thames Water and Environment Agency commented on related matters. Information on how representations have been considered is included in the Statement of Consultation. Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including a Environment workshop on 10th March 2016</p>
<p>Activity: Informal engagement on draft first Regulation 19 policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received. Date: 16th February 2016, 10th May 2016, 13th September 2016, 7th February 2017</p>
<p>Activity: Grand Union Canal workshop Partners involved: Historic England, Canal and River Trust, TfL, HS2 Limited, LB Brent, LB Ealing and LB Hammersmith and Fulham Kensington & Chelsea. Comment: Gathered information regarding the current and planned activities of organisations present at workshops, general information and approach to planning for the Grand Union Canal and adjacent areas. Date: 19 July and 6 October 2016</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base</p>

<p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the policies. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 29th June – 11th September 2017. Overview of Environment policies given to attendees of DtC project meeting on 22nd August 2017.</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included environment policies.</p> <p>Date: 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: Meeting with Environment Agency and Natural England to discuss water management strategy, particularly for Old Oak North.</p> <p>Partners involved: Environment Agency, Natural England and Greater London Authority</p> <p>Comment: Provided an update on OPDC's strategy for managing water, particularly for the early phases of development likely to be brought forward within Old Oak North.</p> <p>Date: 23rd May 2018, 4th September 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Attendees briefed on second Regulation 19 Local Plan key issues, including environment policies. Discussion around OPDC's proposed response</p> <p>Date: 21st August 2018</p>
<p>See other activities under <i>NPPF strategic priority: Climate change mitigation and adaptation; conservation and enhancement of the natural environment</i></p>

NPPF strategic priority: The provision of minerals

A2.41 The OPDC area is not currently covered Department for Business, Energy and Industrial Strategy licences allowing companies to search for minerals, including unconventional oil and gas and to the best of OPDC's knowledge, the geology of the area is unlikely to be suitable for shale gas production. There is a minor possibility of ballast and other materials being discovered during investigation or construction works which could become a useful resource over the duration of the project. As there is limited prospect of this taking place, it is not considered to be a key issue which needs detailed consideration as part of this paper.

NPPF strategic priority: The provision of energy (including heat)

Overview

A2.42 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- EU10

A2.43 The following supporting studies have been developed which relates to this strategic priority (see Appendix 3):

- Utilities Study
- Environmental Standards Study

A2.44 OPDC has been primarily engaging with of the following partners to develop supporting studies (see Appendix 3) including:

- Greater London Authority (GLA);
- Environment Agency;
- UK Power Networks (UKPN);
- Scottish and Southern Energy (SSE);
- National Grid (Gas) (NGG);

These have been identified as particularly appropriate as they are infrastructure providers, have access to land in the area which is relevant to energy generation, or are key prescribed bodies.

A2.45 Based on evidence as part of the Utilities Study, it is anticipated that new energy infrastructure will be developed on sites wholly within OPDC area. The focus of discussion and comments has been related to decentralised energy options.

Engagement activities

A2.46 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 29th September 2015, 24th November 2015</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and emerging Social Infrastructure policies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including a Environment workshop on 10th March 2016.</p>

<p>Activity: Meeting to discuss Decentralised Energy options Partners involved: Brent Council Comment: Shared knowledge on opportunities being explored by OPDC and LBB and to identify any synergies. Date: 4 October 2016</p>
<p>Activity: Meeting to discuss options for Decentralised Energy network Partners involved: Powerday Comment: To review options for a decentralised energy network Date: 2 November 2016</p>
<p>Activity: Meeting to discuss options for Decentralised Energy network Partners involved: HS2 Comment: To understand opportunities for decentralised energy network linked to HS2 activities Date: 2 November 2016</p>
<p>Activity: Meeting to discuss options for Decentralised Energy network Partners involved: Thames Water Comment: To review options for energy extraction from sewers and sustainable water management opportunities Date: 7 November 2016</p>
<p>Activity: Meeting to discuss lessons learned Partners involved: LLDC and the Lea Valley Heat Network Ltd Comment: To review lessons learned from Queen Elizabeth Olympic Park Heat Network and Lea Valley Heat Network Date: 15 November 2016</p>
<p>Activity: Meeting to discuss energy proposals Partners involved: HS2 and UKPN Comment: Sharing information on energy proposals in the area and potential options Date: 22 December 2016</p>
<p>Activity: Meeting to discuss North Acton decentralised energy network Partners involved: Ealing Council and GLA Comment: Presentation and discussion about progress on decentralised energy study Date: 27 February 2017</p>
<p>Activity: OPDC North Acton Decentralised Energy Steering Group Partners involved: GLA, Ealing Council Comment: Stakeholders providing advice and support to the North Acton DCE feasibility study as it progresses. Date: 22 May 2017</p>
<p>Activity: Meeting to discuss options for Decentralised Energy using energy from waste Partners involved: GLA Comment: To review options for energy from waste with the GLA environmental, air quality, waste and energy officers Date: 07 June 2017</p>
<p>Activity: Meeting to discuss options for Decentralised Energy network Partners involved: Powerday Comment: To review options for a decentralised energy network Date: 22 June 2017</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base Partners involved: For details on who was consulted please see Statement of Consultation.</p>

Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 29th June – 11th September 2017. Overview of Environment policies given to attendees of DtC project meeting on 22nd August 2017.

Activity: Presentation of findings from Utilities Study (to date) and workshop with the boroughs
Partners involved: Brent, Ealing, Hammersmith and Fulham, GLA
Comment: Presentation of final report
Date: 20 July 2017

Activity: OPDC North Acton Decentralised Energy Steering Group
Partners involved: GLA, Ealing Council
Comment: Stakeholders providing advice and support to the North Acton DCE feasibility study as it progresses.
Date: 23 October 2017

Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings
Partners involved: see paragraph 3.19
Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included social infrastructure policies.
Date: 19th September 2017, 31st October 2017, 23rd January 2018, 12th June 2018

Activity: Meeting to discuss Decentralised Energy report for North Acton
Partners involved: Ealing Council
Comment: Discussion about progress on feasibility of developing a decentralised low carbon network in North Acton.
Date: 09 November 2017

Activity: OPDC North Acton Decentralised Energy Steering Group
Partners involved: GLA, Ealing Council
Comment: Second stakeholder meeting about feasibility of establishing a North Acton decentralised energy network.
Date: 21 November 2017

Activity: Meeting to discuss Energy from Waste
Partners involved: Powerday
Comment: AECOM study to review energy from waste opportunities with Powerday.
Date: 07 December 2017

Activity: OPDC North Acton Decentralised Energy Steering Group
Partners involved: GLA, Ealing Council
Comment: Progress review on North Acton decentralised energy network.
Date: 11 January 2018

Activity: Meeting to discuss Decentralised Energy report for North Acton
Partners involved: GLA and Ealing Council
Comment: Presentation of final report on feasibility of developing a decentralised low carbon network in North Acton.
Date: 21 March 2018

Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies
Partners involved: For details on who was consulted please see Statement of Consultation.

Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation.

Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018

Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings

Partners involved: see paragraph 3.19

Comment: Attendees briefed on Regulation 19 (2) Local Plan key issues, including housing issues. Discussion around OPDC's proposed response

Date: 21st August 2018

NPPF strategic priority: The provision of health facilities

Overview

A2.47 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- SP3
- TCC4

A2.48 The following supporting study has been developed which relate to this strategic priority (see Appendix 3):

- Social Infrastructure Needs Study

A2.49 OPDC will need to ensure that development in Old Oak and Park Royal is supported by adequate health infrastructure. There are a range of stakeholders with different responsibilities for planning, funding and commissioning types of health care provision. OPDC has been engaging with Clinical Commissioning Groups in Brent, Ealing and Hammersmith and Fulham; NHS England; and Public Health in LB Brent, Ealing and Hammersmith and Fulham. These partners have key responsibilities to support the planning and delivery of services in the OPDC area. OPDC's Social Infrastructure Needs Study has been developed based on close working arrangements with these partners.

A2.50 OPDC's evidence base has been shaped by extensive input and feedback from Brent, Ealing and Hammersmith and Fulham CCGs. The approach to modelling the increased demand for health care infrastructure was agreed with the CCGs. Increased demand for primary care resulting from the early stages of development will be met through the new primary care facility (Park Royal Medical Practice) located within Central Middlesex Hospital and the expansion of Hammersmith Centre for Health, Willesden Centre for Health and Care, and Cloister Road Surgery. The CCGs' high level preference for infrastructure to meet the needs arising from the remainder of the development is for one large primary care facility located in Old Oak.

A2.51 The London Borough of Hammersmith and Fulham raised issues regarding the provision of acute care to cater for population growth arising from development at Old Oak. OPDC recognises that provision of acute care is a matter for the acute hospital trusts and the CCGs in North West London. However, OPDC has and will continue to work with the acute hospital trusts and CCGs in North West London to ensure they are aware of the most up to date population projections from development in the area and can plan accordingly for the delivery of acute care.

Engagement activities

A2.52 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 24th November 2015</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and emerging Social Infrastructure policies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including a Community Infrastructure workshop on 13th February 2016</p>
<p>Activity: Informal engagement on draft first Regulation 19 policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received. Date: 10th May 2016, 13th September 2016, 8th November 2016, 7th March 2017, 21st March 2017.</p>
<p>Activity: Meeting with Hammersmith & Fulham CCG and Head of Strategic Estate Development for Central London, Hammersmith and Fulham, Hounslow and West London CCGs. Partners involved: Hammersmith & Fulham CCG Comment: Provided an update on OPDC's Local Plan, including the number of homes and jobs proposed, the phasing of development and the findings in the DIFS Study 2015. OPDC and Hammersmith & Fulham CCG agreed to continue to work together to model future needs for health care provision. Date: 31st August 2016</p>
<p>Activity: Meeting with Hammersmith & Fulham CCG Partners involved: Hammersmith & Fulham CCG Comment: Hammersmith & Fulham CCG set out their strategic aims for the delivery of health care in H&F, potential options for future health provision for OPDC residents, and options to increase current primary care capacity to support the early developments. Date: 14th October 2016</p>
<p>Activity: Meeting with Director of Public Health Ealing Partners involved: London Borough of Ealing</p>

<p>Comment: Agreed that the CCGs are best placed to decide the health infrastructure required in the OPDC Area. Date: 29th November 2016</p>
<p>Activity: Meeting with Director of Public Health Tri-borough Partners involved: London Borough of Hammersmith and Fulham Comment: Agreed that the CCGs are best placed to decide the health infrastructure required in the OPDC Area. Date: 30th November 2016</p>
<p>Activity: Health Infrastructure Workshop Partners involved: Ealing CCG; Central London, H&F, Hounslow & West London CCGs; Brent, Harrow, Hillingdon and Ealing CCGs; H&F CCG; HUDU; Triborough Public Health. Comment: The CCGs agreed to work with local authority partners to develop the service model for the new population in the OPDC area in order to determine the health facilities required to deliver the service model. Date: 24th January 2017</p>
<p>Activity: Meeting with Director of Public Health Brent Partners involved: London Borough of Brent Comment: Agreed that the CCGs are best placed to decide the health infrastructure required in the OPDC Area. OPDC offered to give presentation to the Brent Health and Wellbeing Board but offer declined at this stage. Date: 6th February 2017</p>
<p>Update: CCGs provided their preferred high level option for the provision of primary health facilities Partners involved: Hammersmith & Fulham CCG, Ealing CCG, Brent CCG Comment: The CCGs preferred option is a large primary care facility to provide services for 50,000 residents Date: 9th March 2017</p>
<p>Activity: Presentation at Ealing Health and Wellbeing Board (HWBB) Partners involved: Ealing CCG, London Borough of Ealing, Imperial College Healthcare NHS Trust, London North West Healthcare NHS Trust, West London Mental Health Trust, Comment: OPDC will continue to provide Ealing HWBB with an update six monthly or more frequently if required. Date: 15th March 2017</p>
<p>Activity: Meeting with NHS Property Services Ltd Partners involved: NHS Property Services Ltd Comment: Agreed that the CCG Strategic Estates Leads in NWL would be OPDC's main points of contact for planning primary and community care facilities. Date: 31st May 2017</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 29th June – 11th September 2017. Overview of Town Centre policies given to attendees of DtC project meeting on 8th August 2017.</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included social infrastructure policies. Date: 19th September 2017, 31st October 2017, 23rd January 2018, 12th June 2018</p>

<p>Activity: Meeting with Imperial College Health Partners (ICHP) Partners involved: ICHP Comment: NWL CCGs commissioned ICHP to support NWL CCGs to agree a health service delivery strategy for the OPDC Area. OPDC met with ICHP to provide background information on the development and to set out the detail that OPDC requires from the CCGs for the Social Infrastructure Needs Study and the Local Plan. Date: 15th December 2017</p>
<p>Activity: Teleconference with Imperial College Health Partners Partners involved: Imperial College Health Partners Comment: OPDC asked that the CCGs confirm the methodology that they are using to calculate the floorspace requirements for the primary and community care facility required in Old Oak. Date: 16th February 2018</p>
<p>Activity: Meeting with representative of the NWL CCGs and Imperial College Health Partners Partners involved: Central London, Hammersmith and Fulham, Hounslow and West London CCGs, Imperial College Health Partners Comment: NWL CCGs agreed that they would base the floorspace requirements for the primary and community care facility on the specifications in Health Building Note 11-01 (published by Department of Health in 2013). The CCGs agreed to provide OPDC with their modelling figures in April. Date: 14th March 2018</p>
<p>Activity: Telephone meeting with Acting Head of Primary Care Commissioning, NHS England – London Region Partners involved: NHS England – London Region Comment: NHS England explained the application process for a new NHS Pharmacy and the process required to commission a new NHS dental practice. It is expected that the demand for opticians in the OPDC Area would be market driven as they are private businesses. Date: 22nd March 2018</p>
<p>Activity: Meeting with NWL CCGs Partners involved: Brent CCG, Central London CCG, Ealing CCG, Hammersmith & Fulham CCG, Harrow CCG, Hillingdon CCG, Hounslow CCG, and West London CCG Comment: The CCGs agreed that population growth in the first phase of Old Oak North and South can be accommodated by increasing the capacity in existing infrastructure. All phases of the population growth in North Acton and Park Royal can be accommodated by capacity in the new Park Royal Medical Practice and increasing the capacity in other existing infrastructure. Phases 2-4 of population growth in Old Oak North and South will be accommodated by delivering a new primary and community care health facility in Old Oak. Date: 24th April 2018</p>
<p>Activity: The CCGs provided their updated modelling for the floorspace requirements for the primary and community care health facility in Old Oak. Partners involved: NWL CCGs Date: 30th April 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation. Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018</p>

<p>Activity: Meeting with CEO and Chair of London North West Healthcare NHS Trust Partners involved: London North West Healthcare NHS Trust Comment: A presentation was given on the development in the OPDC Area and the future population growth. Date: 22nd June 2018</p>
<p>Activity: Meeting with London Borough of Hammersmith and Fulham Partners involved: London Borough of Hammersmith and Fulham Comment: Meeting with borough planning and social care to discuss future population growth in the OPDC Area and the future provision of social care and acute care. Date: 3rd July 2018</p>
<p>Activity: Meeting with CEO of Imperial College Healthcare NHS Trust Partners involved: Imperial College Healthcare NHS Trust Comment: The development in the OPDC Area and the future population growth was discussed. OPDC agreed that it would write to the Accountable Officer for the NWL CCGs to set out the expected population growth in the OPDC Area and to discuss future plans to meet the acute care needs in the area. Date: 12th July 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on Regulation 19 (2) Local Plan key issues, including housing issues. Discussion around OPDC's proposed response Date: 21st August 2018</p>

Ongoing areas of engagement

A2.53 OPDC will continue to work with health delivery partners to ensure that health facilities can meet the primary, community and acute care needs of the future population of the OPDC area.

A2.54 Key points of contact have been established to allow for follow up discussion on section 106 negotiations and the development of the Planning Obligations Supplementary Planning Document.

NPPF strategic priority: The provision of security infrastructure

A2.55 The provision of security infrastructure has been considered in the Local Plan but no specific measures are identified so there are no quantifiable infrastructure requirements or associated impacts. It is not considered to be a cross boundary matter or an issue which will have a significant impact. Therefore, this is not considered to be a key issue which needs detailed consideration as part of this paper.

NPPF strategic priority: Conservation and enhancement of the natural and the historic environment

Overview

A2.56 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- SP9
- D8

A2.57 The following supporting studies have been developed which relate to this strategic priority (see Appendix 3):

- Historic England Old Oak Outline Historic Area Assessment
- OPDC Heritage Strategy
- OPDC Views Study
- OPDC Integrated Impact Assessment
- OPDC Character Study
- OPDC Scrubs Lane Development Framework Principles
- OPDC Cumberland Park Factory Conservation Area Appraisal Report
- LB Ealing Canalside Conservation Area Appraisal (2008) and Management Plan
- LB Hammersmith and Fulham St. Mary's Conservation Area Character Profile
- RB Kensington and Chelsea Kensal Green Cemetery Conservation Area Proposals Statement

A2.58 There are a number of heritage assets outside of the OPDC area and within Old Oak and Park Royal. St. Mary's Conservation Area, Cumberland Park Factory Conservation Area, Canalside Conservation Area, Grade II Listed Brent Viaduct, Grade II Kenmont Primary School, the Rolls Royce Building and Kensal Green Cemetery Grade I Listed Registered Park and Garden (also a conservation area) are considered to be the most significant. Within Kensal Green Cemetery there are a high number of statutory listed structures, including some which are identified by Historic England to be at risk.

A2.59 The impact of development on the surrounding heritage assets and settings needs to be carefully managed. Issues with respect to heritage assets and views are addressed in OPDC's Local Plan. OPDC has engaged with the following key partners on this issue:

- London Borough of Hammersmith and Fulham
- London Borough of Brent
- London Borough of Ealing
- Royal Borough of Kensington & Chelsea
- Greater London Authority
- Historic England
- Canal and River Trust
- TfL
- HS2

These partners have been identified as they include local planning authorities which surround OPDC's area and have heritage assets in the locality. It also includes agencies which have responsibilities for conservation.

A2.60 To date, engagement activities have led to the successful development of OPDC's Heritage Strategy and a robust heritage policy that has been shaped by the boroughs and in close working with Historic England to conserve and enhance heritage assets and the wider historic environment. This is demonstrated by the strengthening of Policy D8 in response to consultation comments provided by Historic England through both Regulation 19 consultations.

A2.61 Discussions with Historic England and the boroughs have also informed the designation of the Cumberland Park Factory Conservation Area and the proposed designation of Local Heritage Listings. These heritage designations are reflected in the Local Plan's place policies.

- A2.62 Historic England, Hammersmith and Fulham and RBKC highlighted concerns regarding the potential for the height and massing of development to negatively impact on the historic significance of heritage assets within and outside of the OPDC area. To help address this, OPDC commissioned a Strategic Views Assessment to support the Scrubs Lane Development Framework Principles. This identified that increased massing and heights may be appropriate in certain locations if development is of the highest quality design – individually and cumulatively. Further consideration will also be given to the issue during the development of the Old Oak North and Scrubs Lane Supplementary Planning Document.
- A2.63 Notwithstanding these comments and as evidenced below, OPDC has engaged positively with stakeholders to develop the heritage policies in accordance with the duty to cooperate.

Engagement activities

- A2.64 Activities related to the constructive, active and ongoing engagement with duty to cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: OPDC Duty to Cooperate meetings Partners involved: See paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and/or evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 1st September 2015, 24th November 2015</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and associated supporting studies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Royal Borough Kensington and Chelsea, London Borough of Hammersmith and Fulham and London Borough of Brent as well as Historic England commented on related matters. Information on how representations have been considered is included in the Statement of Consultation. Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including a Design workshop on 23rd February 2016</p>
<p>Activity: Assessment of existing historic environment of Old Oak and immediate areas informed by a series of meetings. Partners involved: Historic England Comment: Gathered information regarding local existing heritage assets to inform the publication of the Old Oak Common Outline Historic Area Assessment used to inform Regulation 18 and Regulation 19 versions of the Local Plan. Date: 4 February 2016</p>
<p>Activity: Define an approach for conserving and enhancing the historic environment including local heritage designations and views. A series of meetings were held as part of the Duty to Cooperate regular meetings with the boroughs. Specific meeting held with</p>

<p>Historic England on 1 June 2016. Workshop with Partners and community groups held on 20 July.</p> <p>Partners involved: Historic England, LB Brent, LB Ealing, LB Hammersmith and Fulham and RB Kensington & Chelsea</p> <p>Comment: Gathered information regarding local existing and potential future heritage assets. This information has been used to inform the OPDC Heritage Strategy as evidence base for the heritage policies of the Regulation 19 version of the Local Plan to conserve and enhance heritage assets within and around the OPDC area.</p> <p>Date: May 2017</p>
<p>Activity: Define local heritage views to conserve and enhance heritage assets within and around the OPDC area. A series of meetings were held as part of the Duty to Cooperate regular meetings with the boroughs</p> <p>Partners involved: LB Brent, LB Ealing, LB Hammersmith and Fulham and RB Kensington & Chelsea</p> <p>Comment: Gathered information to identify heritage views within and around the OPDC area. This information has been used to inform the OPDC Views Study as evidence base for the key views policies of the Regulation 19 version of the Local Plan to conserve and enhance heritage assets within and around the OPDC area.</p> <p>Date: May 2017</p>
<p>Activity: Explore an approach for conserving and enhancing the Kensal Green Cemetery and its setting to define of local views and potential development principles. Meetings held with Historic England and RB Kensington & Chelsea to define scope (22 November 2016 and 11 January 2017)</p> <p>Partners involved: Historic England, RB Kensington & Chelsea</p> <p>Comment: Discussions carried out to inform emerging scope of for the Kensal Green Cemetery Views Study. This will inform future planning policy and wider OPDC design work.</p> <p>Date: Ongoing</p>
<p>Activity: Define an approach for conserving and enhancing the historic significance of the Grand Union Canal, including the designated portions of the Grand Union Canal Conservation Area, while supporting other roles of the canal (including transport, amenity and biodiversity). Two workshops were held with a range of stakeholders including Historic England, Canal and River Trust, TfL, HS2 Limited, LB Brent, LB Ealing and LB Hammersmith and Fulham Kensington & Chelsea.</p> <p>Comment: Gathered information regarding the current and planned activities of organisations present at workshops, general information and approach to planning for the Grand Union Canal and adjacent areas.</p> <p>Date: 19 July and 6 October 2016</p>
<p>Activity: Development and consultation on OPDC's Local Heritage Listings</p> <p>Partners involved: LB Brent, LB Ealing, LB Hammersmith and Fulham and RB Kensington & Chelsea</p> <p>Comment: Discussions carried out to inform consultation on OPDC's Local Heritage Listings.</p> <p>Date: 20th February 2017</p>
<p>Activity: Informal engagement on draft first Regulation 19 policies as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received.</p> <p>Date: 12th April 2016, 10th May 2016, 24th May 2016, 13th September 2016, 22nd November 2016, 7th March 2017, 21st March 2017</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base</p>

<p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the design policies. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 29th June – 11th September 2017. Overview of Design policies given to attendees of DtC project meeting on 22nd August 2017.</p>
<p>Activity: Meeting to discuss Local Plan Heritage policy</p> <p>Partners involved: Historic England</p> <p>Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received.</p> <p>Date: 4th August 2017 and 9 November 2017</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included design policies.</p> <p>Date: 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: Meeting to discuss Historic England's proposed consultation response to the second Regulation 19 Local Plan consultation</p> <p>Partners involved: Historic England</p> <p>Comment: Discussion carried out to help inform Historic England's response and to define how the Local Plan Heritage Policy has been amended to reflect Historic England's response to the first Regulation 19 Local Plan consultation.</p> <p>Date: 18 July 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Attendees briefed on Regulation 19 (2) Local Plan key issues, including housing issues. Discussion around OPDC's proposed response</p> <p>Date: 21st August 2018</p>
<p>Also see activities under <i>NPPF strategic priority: Climate change mitigation and adaptation; conservation and enhancement of the natural environment</i></p>

Ongoing areas of engagement

A2.65 Ongoing engagement with the boroughs and Historic England is likely to cover the following areas:

- Designation of new and refreshed conservation areas.
- Adoption of OPDC's Local Heritage Listings.
- Securing Statutory Listing of appropriate heritage assets.
- Involvement in the development of supplementary planning guidance related to building heights and massing.

NPPF strategic priority: Climate change mitigation and adaptation; conservation and enhancement of the natural environment

A2.66 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- SP2
- SP8
- D4, D6
- EU9

A2.67 The following supporting study has been developed which relates to this strategic priority (see Appendix 3):

- Environmental Standards Study
- Wormwood Scrubs Survey
- Circular and sharing economy study
- Environmental Modelling Framework
- Waste Management Study
- Waste Apportionment Study
- Air Quality Study

A2.68 Climate change is a major threat to both humans' and nature's life on earth. Development and growth is often viewed as a key risk to climate change, but if well designed, delivered and operated, it can also be a key part of the response. To address this challenge, OPDC has been developing a set of aspirational but deliverable sustainability targets that are aimed at ensuring future development across the Old Oak and Park Royal sites will be exemplar in construction and operation.

A2.69 The Environmental Standards Study is the key part of the evidence base because it covers, energy, waste, materials, carbon emissions, water, air quality, green infrastructure and biodiversity, microclimate and public realm, climate resilience, noise and sustainable transport. OPDC engaged a wide range of partners to test and develop the environmental standards. Relevant statutory agencies and infrastructure providers were also involved to provide technical expertise and insight. Key partners included:

- Environment Agency
- Natural England
- London Borough of Hammersmith & Fulham
- London Borough of Brent,
- London Borough of Ealing
- RB Kensington & Chelsea
- GLA
- Thames Water
- HS2
- TfL

A2.70 Particular issues raised include the need to provide sufficient green infrastructure, including open space, to serve the new development and concerns related to Wormwood Scrubs.

A2.71 As a result of initial engagement and issues raised, OPDC worked with London Borough of Hammersmith and Fulham to gather more baseline information on the

use of the Scrubs to better understand how future development could contribute to its maintenance and improvement.

A2.72 Also, in response to issues raised, more detailed work - Environmental Standards Study – was also commissioned to explore what level of green infrastructure should be provided in Old Oak and Park Royal. The work provided a platform for discussions with a range of stakeholders (see Appendix 3) about how open space needs will be met within OPDC’s area. The process of co-operation and engagement informed and resulted in the successful completion of this work. Three 2ha new Local Parks are identified in Local Plan and these are to ensure the new population has access to additional publicly accessible open space.

A2.73 The Local Plan Environment policies and evidence base has been developed in discussion with the relevant boroughs, the EA and Natural England and this has helped to address more significant issues raised throughout the engagement activities. As such, OPDC considers that it has engaged constructively, actively and on an ongoing basis on this issue.

Engagement activities

A2.74 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

<p>Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015 – ongoing (every 2 weeks)</p>
<p>Activity: Informal engagement on draft Regulation 18 policies as part of regular Duty to Cooperate meetings Partners involved: See paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 14th September 2015, 29th September 2015, 24th November 2015</p>
<p>Activity: Formal consultation on the Regulation 18 Local Plan and associated supporting studies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Hammersmith and Fulham, Brent and the Environment Agency commented on related matters. Information on how representations have been considered is included in the Statement of Consultation. Date: 4th February – 31st March 2016, including duty to cooperate meetings held on 1st March 2016, 15th March 2016 and an including an Environment workshop on 10th March 2016</p>
<p>Activity: Workshop on Environmental Standards Study Partners involved: GLA, London Boroughs of Ealing, Brent, Hammersmith and Fulham and Royal Borough of Kensington and Chelsea, Natural England, Environment Agency, London Waste and Recycling Board (LWARB), Thames Water, HS2, Transport for London Comment: The aim of this workshop was to discuss scope of the study, site issues and opportunities, best practice, an environmental vision and targets. Four groups were</p>

formed to discuss current environmental and sustainability targets: Urban Planning, Transport, Energy, Water and Waste and Green/blue Infrastructure. The opportunity to go beyond these targets was also discussed and helped to inform the environmental vision and objectives for the proposed development.

Date: 6th May 2016

Activity: Presentation of initial findings and assessment of the key issues and options

Partners involved: GLA

Comment: The subsequent discussion helped to steer the focus of the study, identifying the need to include sustainability issues related to daylight and sunlight, the extent of green open space and green roofs, maintenance of amenities, connectivity and examples of best practice.

Date: 11th August 2016

Activity: Developing Wormwood Scrubs Survey

Partners involved: London Boroughs of Ealing, Brent, Hammersmith and Fulham

Comment: After discussions with the three boroughs it was agreed that the most appropriate methodology to find out local views would be in the format of a survey using technology to collate the data.

Date: August – September 2017

Activity: Workshop on Environmental Standards Study

Partners involved: GLA, London Boroughs of Hammersmith and Fulham, Environment Agency, HS2, Transport for London

Comment: The aim of these workshops was to present key findings, recommendations and targets for discussion. This was followed up by sending all attendees copies of the draft topics papers which they were able to review and provide more detailed comments on.

Date: 19th October 2016

Activity: Study tour and workshop on Environmental Standards Study

Partners involved: GLA, Natural England, Environment Agency, Thames Water, Wildlife Trusts

Comment: The aim of these workshops was to present key findings, recommendations and targets for discussion. This was followed up by sending all attendees copies of the draft topics papers which they were able to review and provide more detailed comments on.

Date: 19th October 2016

Activity: Informal engagement on draft first Regulation 19 policies as part of regular Duty to Cooperate meetings

Partners involved: see paragraph 3.19

Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received.

Date: 16th February 2016, 10th May 2016, 13th September 2016, 7th February 2017

Activity: Consultation with GLA environment team to discuss and get feedback on all the environmental policies in the draft Regulation 19 Local Plan.

Comment: Changes were made to the draft policies where relevant in particular to reflect the draft London Environment Strategy and the draft London Plan.

Date: 9th March 2017

Activity: Formal consultation on the first Regulation Local Plan and associated evidence base

Partners involved: For details on who was consulted please see Statement of Consultation.

Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Statement of Consultation.

Date: 29th June – 11th September 2017. Overview of Environment policies given to attendees of DtC project meeting on 22nd August 2017.

<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included environment policies. Date: 19th September 2017, 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: Consultation with GLA environment team to discuss adoption and application of the Urban Green Space Factor Tool. Comment: Urban Green Space Factor tested and adopted by OPDC in line with GLA approach. Date: 23rd January 2018</p>
<p>Activity: Meeting with Environment Agency and Natural England Comment: Discussed overarching approach to sustainable drainage, Old Oak North Development Framework Principles and updated timetable for Local Plan Date: 23rd May 2018, 4th September 2018</p>
<p>Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation. Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018</p>
<p>Activity: Tele conference with Environment Agency Comment: Discussed progress on Local Plan and approach set out in Old Oak North Development Framework Principles Date: 20th August 2018</p>
<p>Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on second Regulation 19 Local Plan key issues, including housing issues. Discussion around OPDC's proposed response Date: 21st August 2018</p>
<p>Also see activities under <i>NPPF strategic priority: The provision of infrastructure for waste management</i></p>

Ongoing areas of engagement

A2.75 There are existing governance arrangements in place for the management of Wormwood Scrubs. OPDC will need to continue engagement with Hammersmith and Fulham to agree any proposals to help maintain and enhance Wormwood Scrubs.

NPPF strategic priority: The provision of community and other local facilities

Background

A2.76 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority:

- SP4
- TCC4

A2.77 The following supporting study has been developed which relates to this strategic priority (see Appendix 3):

- Social Infrastructure Needs Study.

A2.78 The additional homes and associated residential population will increase demands for school places in the area. The host boroughs have statutory duties around education provision, including the need to ensure sufficient school places and in the coordination of funding for all publicly-funded schools in the local education authority area. The GLA is able to provide strategic input, including use of the child yield calculator. OPDC has been working with these partners to develop the OPDC Social Infrastructure Needs Study.

A2.79 The host boroughs have highlighted existing pressures which should be taken into account. The core development area, where the majority of homes will be delivered, is within the London Borough of Hammersmith and Fulham, but immediately surrounding this is Brent, Ealing and Kensington & Chelsea. A range of options were identified during the early stages of plan preparation, including on-site delivery within the OPDC area, off-site enhancements outside of the OPDC area and a mixture of both. OPDC have been working with boroughs and the GLA to prepare additional evidence and has discussed the schools that have the capacity to expand.

A2.80 Both OPDC and the boroughs now have a shared understanding about the anticipated growth in demand for school and early years places through a series of meetings and assumption sharing processes. We have engaged at length with LBHF in particular as they identified capacity within their existing schools at an early stage. The process of co-operation and engagement has resulted in an agreed position on offsite capacity along with the number, type and size of new schools within the OPDC area. Discussions have also helped informed the proposed locations of these new schools.

A2.81 In response to the second Regulation 19 consultation, the London Borough of Brent raised issues with some of detailed assumptions used in assessing education need. OPDC consulted each of the local authorities in formulating these assumptions, and where relevant advice was provided this was incorporated into the assumptions.

Engagement activities

A2.82 Activities related to the constructive, active and ongoing engagement with Duty to Cooperate bodies and decision making as part of the preparation of the OPDC Local Plan and associated evidence base are outlined below:

Activity: OPDC Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18 th August 2015 – ongoing (every 2 weeks)
Activity: Informal engagement on draft Regulation 18 policies as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 24 th November 2015

<p>Activity: Formal consultation on the Regulation 18 Local Plan and emerging Social Infrastructure policies</p> <p>Partners involved: For details on who was consulted please see Statement of Consultation.</p> <p>Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Information on how representations have been considered is included in the Statement of Consultation.</p> <p>Date: 4th February – 31st March 2016, including an Community Infrastructure workshop on 13th February 2016</p>
<p>Activity: Informal engagement on draft first Regulation 19 policies as part of regular Duty to Cooperate meetings</p> <p>Partners involved: see paragraph 3.19</p> <p>Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received.</p> <p>Date: 10th May 2016, 13th September 2016, 8th November 2016, 7th March 2017, 21st March 2017.</p>
<p>Activity: Meeting with council officers</p> <p>Partners involved: London Borough of Hammersmith and Fulham</p> <p>Comment: Discussed and shared information to update the baseline understanding of existing school provision, including number of schools, future expansion potential, guidelines for new school provision. OPDC and LBHF officers agreed to work together to model future needs for school places.</p> <p>Date: 14th September 2016</p>
<p>Activity: Meeting with Hammersmith & Fulham officers</p> <p>Partners involved: London Borough of Hammersmith and Fulham</p> <p>Comment: Discussed and shared information to update the baseline understanding of existing school provision, including number of schools, future expansion potential, guidelines for new school provision. OPDC and LBHF officers agreed to work together to model future needs for school places.</p> <p>Date: 20th September 2016</p>
<p>Activity: Held meeting with Kensington and Chelsea officers</p> <p>Partners involved: RBKC</p> <p>Comment: Discussed the projected educational need of the OPDC and how this need could be addressed. Ability of the existing schools in the vicinity of the OPDC development to expand was also discussed.</p> <p>Date: 8 November 2016.</p>
<p>Activity: Held meeting with LB Ealing officers</p> <p>Partners involved: London Borough of Ealing</p> <p>Comment: Discussed the projected educational need of the OPDC and how this need could be addressed. Ability of the existing schools in the vicinity of the OPDC development to expand was also discussed.</p> <p>Date: 5 December 2016.</p>
<p>Activity: Established and held project group meeting for the OPDC Education and Health Study</p> <p>Partners involved: London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, GLA</p> <p>Comment: Discussed and agreed methodology for modelling future needs for school places.</p> <p>Date: 3rd January 2017, 28th February 2017, 25th April 2017</p>
<p>Activity: Held meeting with GLA Economics and Education and Youth team</p> <p>Partners involved: GLA</p> <p>Comment: To discuss inputs for child yield modelling.</p> <p>Date: 23rd January 2017</p>

<p>Activity: Meeting held with LB Brent officers Partners involved: London Borough of Brent Comment: Discussed the projected educational need of the OPDC and how this need could be addressed. Ability of the existing schools in the vicinity of the OPDC development to expand was also discussed. Date: 28 February 2017.</p>
<p>Activity: Formal consultation on the first Regulation 19 Local Plan and associated evidence base Partners involved: For details on who was consulted please see Statement of Consultation. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Statement of Consultation. Date: 29th June – 11th September 2017. Overview of Town Centre policies given to attendees of DtC project meeting on 8th August 2017.</p>
<p>Activity: Discussion on key issues raised during first Regulation 19 consultation as part of regular Duty to Cooperate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included social infrastructure policies. Date: 19th September 2017, 31st October 2017, 23rd January 2018, 12th June 2018</p>
<p>Activity: OPDC meeting with GLA officers Partners involved: GLA Comment: Agreement on population and Child Yield modelling. Date: 14th March 2018</p>
<p>Activity: Assumptions meeting Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Assumptions to be used within the report were discussed. Following the meeting OPDC sent around minutes and an assumptions paper was distributed for agreement. On 12 April, LB Ealing and LB Brent responded with comments, that were subsequently incorporated into the study. A further meeting with LBHF officers was arranged. Date: 21st March 2018</p>
<p>Activity: LBHF further meeting with Education Officers Partners involved: London Borough of Hammersmith and Fulham Comment: Assumptions discussed in more detail along with off-site capacity in schools within LBHF too. Following this meeting an assumptions paper was sent for agreement. The Boroughs have commented and changes in our assumptions paper and subsequently the report, were made to reflect this. Date: 17th April 2018</p>
<p>Activity: OPDC meeting with London Fire Brigade Partners involved: LFB Comment: OPDC met London Fire Brigade to discuss assumptions in the DIFS and review for the Social Infrastructure Needs Study. Comments have been incorporated within the study. Date: 9th May 2018</p>
<p>Activity: OPDC meeting with Metropolitan Police Partners involved: Metropolitan Police Comment: OPDC met the Met Police to discuss assumptions in the DIFS and review these assumptions for the SINS. Comments have been incorporated within the study. Date: 14th May 2018</p>

Activity: Formal consultation on the second Regulation 19 Local Plan and associated supporting studies

Partners involved: For details on who was consulted please see Statement of Consultation.

Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process. Information on how representations have been considered is included in the Statement of Consultation.

Date: 14th June – 30th July 2018, including duty to cooperate meeting held on 10th July 2018

Activity: Discussion on key issues raised during second Regulation 19 consultation as part of regular Duty to Cooperate meetings

Partners involved: see paragraph 3.19

Comment: Attendees briefed on second Regulation 19 Local Plan key issues, including housing issues. Discussion around OPDC's proposed response

Date: 21st August 2018

Ongoing areas of engagement

A2.83 Boroughs are the local education authorities for OPDC's area and therefore OPDC are committed to an open and transparent dialogue with the Boroughs to respond to their needs and requirements with regards to existing school capacity, expansion and new facilities in the area.

A2.84 Key points of contact have been established to allow for follow up discussion on section 106 negotiations and the development of the Planning Obligations Supplementary Planning Document.

Appendix 3: List of supporting studies and partners involved in their preparation

No.	Supporting Study Title	Topic area	Lead	Bodies involved in the preparation (excluding OPDC)
1	A40 Study	Transport	TfL	N/A. This Study was led/prepared by TfL not OPDC
2	Absorption Rate Study	Housing	OPDC	
3	Affordable Housing Viability Assessment	Housing	OPDC	Viability issues discussed with Housing Panel
4	Air Quality Study	Environment and utilities	OPDC	Discussed at Duty to Cooperate meeting (see invitee list in paragraph 3.19)
5	Bus Strategy	Transport	TfL	N/A. This Study was led/prepared by TfL not OPDC
6	Car Parking Study	Transport	OPDC	
7	Catalyst Uses Study	Town centres and community uses	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
8	Character Areas Study	Design	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
9	Circular and Sharing Economy Study	Environment and utilities	OPDC	
10	Construction and Logistics Strategy	Transport	OPDC	TfL
11	Cultural Principles	Town centres and community uses	OPDC	
12	Decontamination Study	Environment and utilities	OPDC	Environment Agency
13	Development Capacity Study	Crosscutting	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
14	Development Infrastructure Funding Study	Crosscutting	OPDC	
15	Duty to Cooperate Statement	Crosscutting	OPDC	N/A
16	Energy, Overheating and Daylight in Tall Buildings	Environment and Utilities	OPDC	GLA
17	Environmental Modelling Framework Study	Design	OPDC	

18	Environmental Standards Study	Environment and utilities	OPDC	London Borough of Hammersmith & Fulham, London Borough of Brent, London Borough of Ealing, RB Kensington & Chelsea, GLA, Environment Agency, Natural England, Thames Water, HS2, TfL
19	Future Employment Growth Sectors Study	Employment	OPDC	Brent, Ealing and Hammersmith and Fulham and GLA involved in Project Steering Group meetings.
20	Grand Union Canal Massing and Enclosure Note	Places	OPDC	
21	Gypsy and Traveller Assessment and Addendum	Housing	OPDC	London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, RB Kensington and Chelsea and Oxfordshire County Council
22	Healthy Town Centres Study	Town centres and community uses	OPDC	
23	Heritage Strategy	Design	OPDC	Brent, Ealing and Hammersmith and Fulham interviewed and Historic England invited to workshop to inform this work.
24	Housing Evidence Statement	Housing	OPDC	
25	Industrial Estates Study	Employment	OPDC	LBB, LBE, GLA
26	Industrial Land Review and Addendum	Employment	OPDC	
27	Infrastructure Delivery Plan (IDP)	Crosscutting	OPDC	N/A. Projects listed in IDP schedule have been drawn from other supporting studies
28	Integrated Impact Assessment	Crosscutting	OPDC	N/A
29	Integrated Water Management Strategy	Environment and utilities	OPDC	GLA; Thames Water Utilities Ltd; Environment Agency; LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea, Canal and River Trust
30	Land at Abbey Road Development Options Appraisal Report	Employment	OPDC	
31	North Acton District Energy Network Study	Utilities	OPDC/GLA/LBE	GLA (Peter North), LB Ealing
32	North Acton Station Feasibility Study	Transport	TfL	OPDC, LBE, GLA
33	Old Oak North Development Framework Principles	Places	OPDC	Discussed at Duty to Cooperate meetings
34	Old Oak Outline Historic Area Assessment	Design	Historic England	

35	Old Oak Strategic Transport Study	Transport	OPDC	Transport for London, GLA, OPDC, the London Boroughs of Hammersmith & Fulham, Ealing and Brent, HS2, Network Rail
36	Park Royal Atlas	Crosscutting	GLA/OPDC	TfL, LBE, LBB, LBHF
37	Park Royal Intensification Study	Employment	OPDC	OPDC, GLA, (London Boroughs invited to stakeholder workshop)
38	Park Royal Development Framework Principles	Places	OPDC	London Borough of Brent, London Borough of Ealing, Brent CCG and London North West Healthcare NHS Trust
39	Park Royal Transport Strategy	Transport	TfL/OPDC	Park Royal Business Group, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith & Fulham, Royal Borough of Kensington and Chelsea, TfL, WestTrans
40	Post Occupancy Evaluation Study	Environment and Utilities	OPDC	GLA
41	Precedent Study	Crosscutting	OPDC	
42	Public Realm, Walking and Cycling Strategy	Transport	OPDC	Brent, Ealing and Hammersmith and Fulham, TfL
43	Quantitative tracking survey	Monitoring	OPDC	
44	Retail and Leisure Needs Study and Update	Town centres and community uses	OPDC	Brent, Ealing and Hammersmith and Fulham, RBKC and GLA
45	Scrubs Lane Development Framework Principles	Places	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
46	Sites of Importance for Nature Conservation Statement	Environment and utilities	OPDC	
47	Smart Strategy	Environment and utilities	OPDC	GLA
48	Social Infrastructure Needs Study	Town centres and community uses	OPDC	Tri-Borough Education Team, Royal Borough of Kensington & Chelsea, London Borough of Ealing, London Borough of Hammersmith, London Borough of Brent, GLA, Metropolitan Police, London Fire Brigade, CCGs (see glossary).
49	Socio-Economic Baseline Study	Crosscutting	OPDC	GLA
50	Sports Courts and Swimming Pools Study	Town centres and community uses	LBHF	N/A. This Study was led/prepared by LBHF not OPDC

51	Statement of Community Involvement	Crosscutting	OPDC	N/A
52	Strategic Housing Market Assessment	Housing	OPDC	Brent, Ealing and Hammersmith and Fulham, GLA
53	Tall Buildings Statement	Design	OPDC	GLA
54	Utilities Study	Environment and utilities	OPDC	GLA, UK Power Networks, Scottish and Southern Energy, National Grid (Gas), Thames Water ;Canal and River Trust; HS2 Ltd; Representatives from Powerday Limited; and Promoters and operators of the Kings Cross Heat Network, Queen Elizabeth Olympic Park Heat Network, Bunhill Heat network and the planned Lea Valley Heat network;
55	Victoria Road and Old Oak Lane Development Framework Principles	Places	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
56	Views Study	Design	OPDC	
57	Waste Apportionment Study	Environment and utilities	OPDC	WRWA planning authorities involved in Technical paper which underpins this.
58	Waste in Tall Buildings	Environment and Utilities	OPDC	GLA, LWARB, LBHF
59	Waste Management Strategy	Environment and utilities	OPDC	
60	Waste Technical Paper	Environment and utilities	OPDC	LBHF, RBKC, LB Lambeth, LB Wandsworth
61	Whole Plan Viability Study	Crosscutting	OPDC	N/A
62	Willesden Junction Station Feasibility Study	Transport	TfL/OPDC /LBB	TfL, OPDC, LBB, LBHF, Network Rail
63	Wormwood Scrubs Survey	Places	OPDC	LBHF, LBB, LBE

Appendix 4: Key steps in the decision making process

<p>Decision: Report to OPDC Planning Committee on the West London Waste Plan Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Planning committee recommend that Board adopt the WLWP. Date: 15th July 2015</p>
<p>Decision: Report to OPDC Board on the West London Waste Plan Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: OPDC Board agree to WLWP being adopted as a Development Plan Document. Date: 28th July 2015</p>
<p>Decision: Report to OPDC Planning Committee on the Old Oak and Park Royal Opportunity Area Planning Framework Consultation Responses Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Planning committee recommend OAPF to the OPDC Board for endorsement and recommendation that the Mayor of London adopts the OAPF as amended. Date: 2nd September 2015</p>
<p>Decision: Report to OPDC Board on the Old Oak and Park Royal Opportunity Area Planning Framework Consultation Responses Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham. Representatives from the Greater London Authority and Transport for London, are also observers to the Board. Comment: Board recommends that the Mayor of London adopts the OAPF as amended. Date: 15th September 2015</p>
<p>Decision: Report and Presentation to OPDC Planning Committee on Draft Local Plan (Regulation 18) Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: The Planning Committee is asked to comment on the draft Local Plan, the draft Integrated Impact Assessment (IIA) and the draft Summary of Supporting Studies Document. Committee recommended that the Board agree to consult on the draft Local Plan. Date: 6th January 2016</p>
<p>Decision: Report and Presentation to OPDC Board on the Regulation 18 Local Plan Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham. Representatives from the Greater London Authority and Transport for London, are also observers to the Board. Comment: The Board agreed to first stage of public consultation on the draft Local Plan (Regulation 18); be agreed, to include those changes recommended by the Planning Committee. Date: 25th January 2016</p>
<p>Decision: Report to OPDC Planning Committee on the key issues arising from the Regulation 18 consultation Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Opportunity to comment on officers' proposed response to the key issues for referral to the OPDC Board and to inform the drafting of the Regulation 19 Local Plan and accompanying Statement of Consultation document. Waste apportionment and existing waste sites were identified as key issues. Date: 7th September 2016</p>

<p>Decision: Report and Presentation to OPDC Board on the key issues arising from the Regulation 18 consultation</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham. Representatives from the Greater London Authority and Transport for London, are also observers to the Board.</p> <p>Comment: Opportunity to comment on officers' proposed response to the key issues to inform the drafting of the Regulation 19 Local Plan and accompanying Statement of Consultation document.</p> <p>Date: 21st September 2016</p>
<p>Decision: Report and Presentation to OPDC Planning Committee on (first) Regulation 19 Local Plan</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham</p> <p>Comment: Opportunity for Planning Committee to comment on the Regulation 19 draft Local Plan. Committee recommended that the Board agree to consult on the Regulation 19 Local Plan, the Integrated Impact Assessment, Statement of Consultation, Supporting Studies Summary Document and the supporting studies, as amended to reflect the contents of the Addendum report and the comments submitted by the Committee.</p> <p>Date: 3rd May 2017</p>
<p>Decision: Report and Presentation to OPDC Board on (first) Regulation 19 Local Plan</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham. Representatives from the Greater London Authority and Transport for London, are also observers to the Board.</p> <p>Comment: The Board approved public consultation on the second Regulation 19 Local Plan and its associated appendices; to include those changes recommended by the Planning Committee.</p> <p>Date: 22nd June 2017</p>
<p>Decision: Report and Presentation to OPDC Board on the key issues arising from the (first) Regulation 19 consultation</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham. Representatives from the Greater London Authority and Transport for London, are also observers to the Board.</p> <p>Comment: Opportunity to comment on officers' proposed response to the key issues to inform next steps on the Local Plan and accompanying Statement of Consultation document.</p> <p>Date: 7th November 2017</p>
<p>Decision: Report and Presentation to OPDC Planning Committee on the second Regulation 19 Local Plan</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham</p> <p>Comment: Opportunity for Planning Committee to comment on the second Regulation 19 draft Local Plan. Committee recommended that the Board agree undertake a second Regulation 19 public consultation on the draft Local Plan, the Integrated Impact Assessment, Statement of Consultation, Supporting Studies Summary Document and supporting studies.</p> <p>Date: 6th June 2018</p>
<p>Decision: Report and Presentation to OPDC Board on second Regulation 19 Local Plan</p> <p>Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham. Representatives from the Greater London Authority and Transport for London, are also observers to the Board.</p> <p>Comment: The Board approved public consultation on the second Regulation 19 Local Plan.</p> <p>Date: 12th June 2018</p>

Appendix 5: Glossary of key bodies involved in Duty to Cooperate discussions

There are a number of organisations who have played a particularly key role in helping to identify and develop the strategic issues and priorities to be considered as part of the Local Plan and will also be key in helping in their monitoring and delivery. These include:

Clinical Commissioning Groups (CCGs)

CCGs were created following the Health and Social Care Act in 2012, and replaced Primary Care Trusts on 1 April 2013. CCGs are clinically-led statutory NHS bodies responsible for the planning and commissioning of health care services for their local area. There are a number of CCGs operating in OPDC's area including: NHS Brent CCG, NHS Ealing CCG and NHS Hammersmith and Fulham CCG. NHS West London CCG is adjacent to the boundary of the OPDC Area. NHS North West London Collaborative of Clinical Commissioning Groups (NWL CCGs) is a collaboration of NHS Brent CCG, NHS Central London CCG, NHS Ealing CCG, NHS Hammersmith & Fulham CCG, NHS Harrow CCG, NHS Hillingdon CCG, NHS Hounslow CCG, and NHS West London CCG.

London Boroughs of Brent, Ealing and Hammersmith and Fulham

OPDC has engaged with the three Councils at both an officer and member level on dealing with a number of specific issues (see Appendix 2). OPDC coordinate the Duty to Cooperate Project Team meetings which council officers regularly attend. Officers have also attended workshops and project steering groups related to a number of work streams. We have also worked together at both an officer level as constituent members of the West London Waste Plan and Western Riverside Waste area (see Western Riverside boroughs below). OPDC's planning committee and Board also include Brent, Ealing and London Borough of Hammersmith and Fulham. All of the host boroughs are responsible for performing a number of statutory functions within the OPDC area. This includes their roles as the local housing, education, highways and lead local flood authorities and for local air quality management. Therefore, we have involved relevant officers as part of the plan process and we will continue to do this to ensure that measures can be implemented and delivered.

Environment Agency

The Environment Agency's key responsibilities include regulating major industry and waste facilities, treatment of contaminated land, water quality and resources and conservation and ecology. They are also responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea. OPDC has primarily worked with the EA at an officer level. The Agency provided comments on policies and evidence base in advance of formal public consultation and has also been involved at all formal stages of the process to date.

Greater London Authority

The OPDC is a functional body of the Greater London Authority, and as such the Mayor and London Assembly have oversight. The Local Plan must also be in general conformity with the Mayor's London Plan. GLA officers are invited to attend the Duty to Cooperate meetings and OPDC has worked with the GLA at an officer level as part of project steering groups related to a number of work streams. The Mayor is also responsible for establishing and chairing the London Economic Action Partnership (LEAP) Board. LEAP is the Local Enterprise Partnership for London and it operates as non-incorporated consultative and advisory body. As a Mayoral appointed body with no separate independent or corporate legal status, the LEAP operates through the GLA which acts as LEAP's "accountable body".

Historic England

Historic England is the government's statutory adviser on the historic environment, championing historic places and helping people to understand, value and care for them. Historic England is an executive non-departmental public body, sponsored by the Department for Culture, Media & Sport. OPDC has worked with Historic England at an officer level to provide comments on the identification and protection of heritage assets including the designation of the Cumberland Factory Conservation Area and they were responsible for preparing the Outline Historic Assessment of the Old Oak area.

Royal Borough of Kensington and Chelsea

OPDC engages with the Council at both an officer level on dealing with a number of specific issues (see Appendix 2) such as assessing the impact on heritage assets. OPDC coordinate the Duty to Cooperate Project Team meetings which Council officers have attended. Officers have also attended workshops and project steering groups related to a number of work streams. We have also worked together at both an officer level as a group of Western Riverside waste planning area (see Western Riverside boroughs below).

Natural England

Natural England is the government's adviser on the natural environment, providing practical scientific advice on how to look after England's landscapes and wildlife. It is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs (DEFRA). OPDC has worked with Natural England at an officer level to provide opportunities for them to comment/share ideas in advance of any formal public consultation and it has also been involved at all formal stages of the process to date.

OPDC Housing Panel

The Housing Panel was established to help inform the development of OPDC's housing strategy and related Local Plan policies to enable delivery of the potential 25,500 homes within OPDC's area. Members are invited to share ideas, best practice (national and international) and provide constructive criticism to help OPDC make progress in developing its planning policies. Members include representatives from the GLA/HCA, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham and London Councils.

Thames Water

As the statutory water and waste water provider we have worked with Thames Water at an officer level as part of steering groups to develop the Integrated Water Management Strategy and they have been commissioned to prepare or verify evidence base with regards to utilities infrastructure. These activities have helped direct policy development. Thames Water has been involved at all formal stages of the process to date.

Transport for London (TfL)

TfL is the integrated transport authority responsible for delivering Mayor of London commitments on transport. TfL run the day-to-day operation of the Capital's public transport network and manage London's main roads, including the London Underground, A406 and A40 running through OPDC's area.

Western Riverside boroughs

The OPDC area within Hammersmith and Fulham falls within the Western Riverside Waste Authority (WRWA) area. Western Riverside Waste Authority (WRWA) is the statutory body responsible for the management of the waste delivered to it by:

- London Borough of Hammersmith and Fulham
- Royal Borough of Kensington and Chelsea
- London Borough of Lambeth
- London Borough of Wandsworth

Each individual local authority also has separate statutory responsibilities as waste planning authorities to plan for the management of waste in their areas. OPDC has been working with the Western Riverside boroughs to understand the waste management capacity across this area.

Other bodies

As part of the Duty to Cooperate process the Council has also engaged with a number of other bodies and these include:

- Canal and River Trust
- London North West Healthcare NHS Trust
- West London Mental Health Trust
- Central and North West London NHS Foundation Trust
- London Waste Planning Forum
- HS2 Ltd
- UK Power Networks
- Scottish and Southern Energy
- National Grid