OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Policy Formulation Reports
Design Chapter

June 2018

MAYOR OF LONDON

Overview

Policy Formulation Reports are being produced to help demonstrate how individual policies have been developed.

These reports continue to be developed. Further updates will be made to support the submission of the Local Plan.

D1. Securing High Quality Design

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
9	Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to): • making it easier for jobs to be created in cities, towns and villages; • moving from a net loss of bio-diversity to achieving net gains for nature; • replacing poor design with better design; • improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.
17	Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should: … • Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
56	The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
57	It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
59	Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.
62	Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review1. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.
66	Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.

188	Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.
189	Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they do offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications.
203	Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

National Planning Practice Guidance (NPPG)

Making an application	
The value of pre-application engagement	
Policy / paragraph reference	**Policy and paragraph text**
Title: How can pre-application engagement improve the efficiency and effectiveness of the planning application system? **Paragraph:** 001 **Reference ID:** 20-001-20150326 **Revision Date:** 26 03 2015	Pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications and their likelihood of success. This can be achieved by: • providing an understanding of the relevant planning policies and other material considerations associated with a proposed development • working collaboratively and openly with interested parties at an early stage to identify, understand and seek to resolve issues associated with a proposed development • discussing the possible mitigation of the impact of a proposed development, including any planning conditions • identifying the information required to accompany a formal planning application, thus reducing the likelihood of delays at the validation stage. The information requested must be reasonable (more information can be found in Making an application. • putting in place a Planning Performance Agreement where this would help with managing the process and agreeing any dedicated resources for progressing the application The approach to pre-application engagement needs to be tailored to the nature of the proposed development and the issues to be addressed.
Policy / paragraph reference	**Policy and paragraph text**
Title: How can design review relate to	The National Planning Policy Framework recognises the benefits of design review in appropriate cases. The local planning authority should consider offering design review when appropriate, as part of their pre-

the pre-application stage? **Paragraph:** 014 **Reference ID:** 20-014-20140306 **Revision Date:** 06.03.2014	application service. While a design review can take place at any point during the pre-application or planning application process, it is particularly beneficial if undertaken once the site's constraints and opportunities have been established and before a proposal has been developed in any great detail. Being able to inform and influence the design of a proposed development at this early stage is more efficient than trying to implement suggested revisions at a later stage – particularly if this relates to a major proposal and/or one that will require an Environmental Impact Assessment. If undertaken at the pre-application stage, a prospective applicant is encouraged to articulate the findings and outcomes of the design review process when making a formal planning application. This explanation could be included in a Design and Access Statement in instances where one is required. Design and Access Statements can help local planning authorities and other interested parties understand the evolution and rationale behind the proposed design.

Design	
The importance of good design	
Title: Why Does Good Design Matter? **Paragraph:** 001 **Reference ID:** 26-001-20140306 **Revision Date:** 06.03.2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: How is good design delivered through plan making? **Paragraph:** 003 **Reference ID:** 26-003-20140306 **Revision Date:** 06.03.2014	Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning, and should be at the heart of the plan making process. The National Planning Policy Framework requires Local Plans to develop robust and comprehensive polices setting out the quality of development that will be expected for the area. Local planning authorities will need to evaluate and understand the defining characteristics of the area as part of its evidence base, in order to identify appropriate design opportunities and policies. These design policies will help in developing the vision for an area. They will assist in selecting sites and assessing their capacity for development. They will be useful in working up town centre strategies, and in developing sustainable transport solutions; all aimed at securing high quality design for places, buildings and spaces.
Which planning processes and tools can we use to help achieve good design?	
Title: Which planning	In development plans:

processes and tools can we use to help achieve good design? **Paragraph:** 029 **Reference ID:** 26-029-20140306 **Revision Date:** 06.03.2014	The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies In planning applications: In the evolution of planning applications and proposals there are established ways in which good design can be achieved. These include: • pre-application discussions • design and access statements • design review • design codes • decisions on applications • the use and implementation of planning conditions and agreements
Title: Good masterplans and briefs **Paragraph:** 032 **Reference ID:** 26-032-20140306 **Revision Date:** 06.03.2014	Masterplans can set out the strategy for a new development including its general layout and scale and other aspects that may need consideration. The process of developing masterplans will include testing out options and considering the most important parameters for an area such as the mix of uses, requirement for open space or transport infrastructure, the amount and scale of buildings, and the quality of buildings. Masterplans can show these issues in an indicative layout and massing plan where the shape and position of buildings, streets and parks is set out. Masterplans can sometimes be submitted for outline planning permission or they can be adopted as local policy requirements. Care should be taken to ensure that masterplans are viable and well understood by all involved. In particular graphical impressions of what the development will look like should not mislead the public by showing details not yet decided upon as certainties. Masterplans, briefs and site policies can stay in place for a long time. They need to be flexible enough to adapt to changing circumstances.
Title: Using Design review **Paragraph:** 035 **Reference ID:** 26-035-20140306 **Revision Date:** 06.03.2014	Design Review is a tried and tested method of promoting good design and is an effective way to improve quality. Local planning authorities should have local design review arrangements in place to provide assessment of proposals and to support high standards of design. Local authorities should, when appropriate, refer major projects for a national design review. Design review is most effective if done at the early stages of an application, and in many cases local authorities charge for this as part of a pre-application service.
Title: Using design	A design code is a type of detailed design guidance that is particularly useful for complex scenarios involving multiple parties in long-term

codes **Paragraph:** 036 **Reference ID:** 26-036-20140306 **Revision Date:** 06.03.2014	development. A code can be a way of simplifying the processes associated with new development to give more certainty to all those involved and help to make high quality places. Code preparation can allow organisations and local communities to work together more effectively, helping to build consensus about what kind of place everyone wants to create. Design codes vary mainly according to their level of prescription (what they fix and what they leave flexible) and the scale at which they operate. They may be appropriate for use on an area basis to shape new build development. They can be applied to all development types including residential, commercial, mixed use, redevelopment of parts of towns or cities, open space, landscape or public realm requirements. Design codes can be used in other situations. For example, they may be appropriate to guide the design of repetitive minor householder planning applications such as house extensions, alterations, and the like in a particular locality. They often link to adopted masterplans. Preparing a good code is about finding a balance between technical specificity and a succinct description of what is required. Some of the best and most effective codes are very short. Design codes seek to capture the specific requirements of a place and encourage interested parties to think together about each development in its entirety as a unique place. Local planning authorities and developers should consider using design codes where they could help deliver high quality outcomes where for example: • they wish to coordinate design outcomes across large or complex sites to deliver a coherent locally agreed vision; • wish to ensure consistency across large sites which may be in multiple ownership and/or where development is to be phased and more than one developer and design team is likely to be involved; Codes can also be used by applicants when submitting a planning application, if there is a need to retain some flexibility on the final design of the development (eg if the development is a self/custom build housing scheme where the final design of homes depends on the preferences of future home owners). To promote speed of implementation, avoid stifling responsible innovation and provide flexibility, design codes should wherever possible avoid overly prescriptive detail and encourage sense of place and variety (unless local circumstances can clearly justify a different approach). Codes should be succinct and carefully distinguish mandatory from discretionary components, avoiding ambiguous aspirational statements, unnecessary jargon and they should define any use of key technical terms. Although design codes are most often used as part of the planning

	application process they can be used at other points including: • via formal adoption, principally through a Local Plan or neighbourhood plan; • by being incorporated within Community Right to Build Orders or as part of a local development order or Neighbourhood Development Order; and • by the exercise of freehold rights through development agreements and covenants. The choice of approach depends on local circumstances and the aims and aspirations of the promoter of the code.
Title: Using planning agreements and conditionsdesign codes **Paragraph:** 038 **Reference ID:** 26-038-20140306 **Revision Date:** 06.03.2014	The design process often continues after the granting of permission. If the local authority feels that detailed design issues are central to the acceptability of a scheme, they may wish to use conditions to require these to be approved at a later date. This could be due to the sensitivity of the site, its relationship to existing properties or because permission relied on the integrity and quality of the architecture and landscape design proposed. Whilst conditions can be used to improve the certainty of the design outcome that will be delivered, the Local Planning Authority should ensure that each condition meets the 6 tests in National Planning Policy Framework policy. Conditions that prescribe very detailed specifications for materials (such as bricks) should not be used unless they are necessary, for example where there is a heritage or design need . Local planning authorities can avoid overly rigid conditions by building in the flexibility to allow them to permit acceptable alternatives. This is particularly useful where there may be supply shortages of materials or to encourage innovative appropriate alternative approaches (for example, off-site construction).

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	LIFETIME NEIGHBOURHOODS Strategic A In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles set out in paragraph 7.4A. Planning decisions B Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport. C Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods.

	D The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood. E The policies in this chapter provide the context within which the targets set out in other chapters of this Plan should be met. LDF preparation F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate. G Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms.

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG1	Building strong and inclusive communities To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city. B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation. C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish. D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time. E Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements. F Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.
GG3	Creating a healthy city

	To improve Londoners' health and reduce health inequalities, those involved in planning and development must: A Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities. B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. C Use the Healthy Streets Approach to prioritise health in all planning decisions. D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments. E Plan for improved access to green spaces and the provision of new green infrastructure. F Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold. G Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.
D2	Delivering good design Initial evaluation A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and areabased strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. Determining capacity for growth

	B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. Design analysis and visualisation C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. Design quality and development certainty D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics. Design scrutiny E Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan. F Boroughs and applicants should use design review to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, if they: 1) are above the applicable density indicated in Part C of Policy D6 Optimising housing density; or 2) propose a building defined as a tall building by the borough (see Policy D8 Tall buildings), or that is more than 30m in height where there is no local tall building definition. G The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that: 1) design reviews are carried out transparently by independent experts in relevant disciplines 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on recommendations of previous design reviews 4) design review recommendations are appropriately recorded and communicated to officers and decision makers 5) schemes show how they have considered and addressed the design review recommendations 6) planning decisions demonstrate how design review been addressed. Maintaining design quality H The design quality of development should be retained through to completion by: 1) having a sufficient level of design information, including key

	construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter 4) local planning authorities using architect retention clauses in legal agreements where appropriate.

Supplementary Planning Documents

Policy / paragraph reference	Policy and paragraph text
	None directly applicable

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
6.9	Alternative policy options are not considered to be appropriate in light of the comprehensive and detailed regional guidance provided by the London Plan and Old Oak and Park Royal Opportunity Area Planning Framework.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Design experience: OPDC Planning Committee should consider including members with a design background.	Wells House Road Residents Association, 1 local resident	Noted. The make-up of the Planning Committee is determined by OPDC Board.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Encourage developers to engage in pre-application	Canal & River Trust	Change proposed. OPDC has made reference to

discussions with statutory consultees.		engaging in pre-application discussions with other relevant statutory consultees within D1.
Planning policy should not involve itself with the appointment of appropriately qualified professional design firms by private developers. This requirement should be removed.	Old Oak Park Limited	Change proposed. This has been removed from the policy.
Design guidelines are better secured through planning conditions. Request wording be amended to include planning conditions or, where this is not possible, section 106 agreements.	Old Oak Park Limited	Change proposed. OPDC has amended the supporting text to make reference to secure design guidelines as part of Section 106 agreements and / or planning conditions.
Policy is sound	A Somefun, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Policy is unsound	Sarah Abrahart	Noted. OPDC considers Policy D1 to be sound.
Showing precedents of buildings of 8-14 storeys is unrealistic given what is proposed.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the precedent of Tate Modern to be an appropriate precedent for delivering high quality design within a high-density area.
The OPDC Place Review Group so far has not delivered any distinguished design. OPDC's Place Review Group should be reformed and include experienced lay members	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC's Place Review Group comprises a panel of built environment experts to provide independent advice for development proposals. A Community Review Group has been established to inform the development management process. This has been referenced in policy D1.
There is a potential conflict of interest between the role of	Hammersmith Society, Wells House Road Residents	No change proposed. OPDC's plan making and

the OPDC as 'Development Corporation' and 'Planning Authority'	Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	development management roles as the local planning authority are implemented in accordance with legislation and national guidance. These duties are carried out separately to those as OPDC as a future potential landowner.
Concerns that OPDC has a lack of commitment to high quality design.	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Catherine Sookha, Regents Network	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.
Support D1b)v)	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
The policy is not effective. Further clarity required for setting out different options and proactive community engagement. It should refer to the need for engagement with local people, via neighbourhood forums, as early as possible in the design process.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Grand Union Alliance	Change proposed. Proactive engagement is set out in OPDC's Statement of Community Involvement. This was updated in February 2017 to reflect requests by community groups to secure more effective engagement. The Community Review Group has been established to inform the development management process. This has been referenced in D1. Policy D1 will continue to require major and strategic development proposals to undertaken proactive engagement with the community.
Figure 5.2: Tate Modern is an inappropriate precedent.	Regents Network	No change proposed. OPDC considers the precedent of Tate Modern to be an appropriate precedent for delivering high quality design

		within a high-density area.
Insufficient DM guidance to deliver Lifetime Neighbourhoods and achieve aspirations for SP2 and SP4	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the full range of Strategic Policies, Place Policies, Development Management Policies and those set out in the London Plan alongside national guidance facilitate the delivery of Lifetime Neighbourhoods within the OPDC area. Specifically, these are considered to deliver the three principles for Lifetime Neighbourhoods: 1. can get around – neighbourhoods which are well-connected and walkable. 2. as far as possible, can have a choice of homes, accessible. 3. belong to a cohesive community which fosters diversity, social interaction and social capital.
Further consideration of how high quality design is measured is required.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.
Change policy title to "Securing High Quality Design and Lifetime Neighbourhoods". Refer to Lifetime Neighbourhoods within the opening sentence of D1 and through the policy including: - community ownership and security - adequate community orientated facilities and meeting places - adaptable and imaginative buildings that are designed to last for 150 years neighbourhoods that are inclusive, - human and beautiful, providing for whole communities with spiritual	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Lifetime Neighbourhoods are referenced in Policy SP2 and D3. No change is proposed to the policy wording. Supporting community ownership is set out in Policy DI3, delivering community facilities is set out in policies SP4, TCC4 and place policies, delivering high quality resilient buildings is set out in policies SP2 and SP9.

makers, facilitators and educators at their heart,		
Specify what 'relevant and appropriate' means in D1(a)	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. "Where relevant and appropriate" enables OPDC to consider how to respond to the unique aspects of individual proposals in determining planning applications.
D1(b)iv is not consistent with NPPF para 57 due to it being limited to major and strategic schemes.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D1(a) complements D1(b)(iv) by setting out requirements for all development proposals. This ensures Policy D1 as a whole accords with NPPF paragraph 57.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Character Areas Study	• Identifies key physical characteristics and character issues across the Corporation area and its boundaries. • Outlines specific character based recommendations for adding value to design of development.
Environmental Modelling Framework Study	• Based on a review of published research, design guides, different modelling tools and consultation with a number of experts in the field, an approach has been developed to measure performance against some aspects of wellbeing and energy efficiency. • This framework can be used as a tool to compare alternative designs, by providing an objective and systematic means to evaluate them. It should also be used in conjunction with other aspects of urban design such as design for amenity, quality of space and access to services to provide a holistic design approach.
Environmental Standards Study	• Research used to advise the best methods for delivering high quality design that meets OPDC's environmental sustainability aspirations. • Key areas include air quality, noise and vibration, flooding, overheating, daylight and sunlight and open space and urban greening standards; and resource issues including energy, waste, material and water use.
Heritage Study	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:

	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Old Oak Outline Historic Area Assessment	• Summarises historical development of the area's built environment and identifies designated assets that need to be considered throughout the design process.
Precedents Study	• A series of lessons are identified for each precedent within the study which act as recommendations for future similar schemes within the OPDC area. • It is advised that further work is undertaken to assess a number of the schemes in further detail to inform the master planning process at Old Oak, or specific future schemes within the area.
Public Realm, Walking and Cycling Strategy	• Provides a framework for delivering an exemplar sustainable and accessible urban environment in Old Oak and Park Royal with high quality public realm. • Makes 10 design recommendations for creating a network where walking and cycling are comfortable, safe and efficient choices for people moving around the local area.
Views Study	• Creates guidelines to ensure that the overall impact of new development on local character is carefully considered in the design.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D2. Public Realm

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Paragraph Reference	Paragraph
17	• Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. • Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
35	Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones.
58	Planning policies and decisions should aim to ensure that developments: • Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
60	Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.
61	Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
67	Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.
69	Planning policies and decisions, in turn, should aim to achieve places which promote: • safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

National Planning Practice Guidance (NPPG)

Policy / Paragraph Reference	Paragraph

Title: Planning should promote local character (including landscape setting) **Paragraph:** 007 **Reference ID:** 26-007-20140306 **Revision Date:** 06.03.2014	Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation. The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre. When thinking about new development the site's land form should be taken into account. Natural features and local heritage resources can help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place. Views into and out of larger sites should also be carefully considered from the start of the design process. Local building forms and details contribute to the distinctive qualities of a place. These can be successfully interpreted in new development without necessarily restricting the scope of the designer. Standard solutions rarely create a distinctive identity or make best use of a particular site. The use of local materials, building methods and details can be an important factor in enhancing local distinctiveness when used in evolutionary local design, and can also be used in more contemporary design. However, innovative design should not be discouraged. The opportunity for high quality hard and soft landscape design that helps to successfully integrate development into the wider environment should be carefully considered from the outset, to ensure it complements the architecture of the proposals and improves the overall quality of townscape or landscape. Good landscape design can help the natural surveillance of an area, creatively help differentiate public and private space and, where appropriate, enhance security.
Title: Planning should promote safe, connected and efficient streets **Paragraph:** 008 **Reference ID:** 26-008-20140306 **Revision Date:** 06.03.2014	Many of our streets already exist and the way they are changed or managed will not fall within planning controls. However large scale developments are likely to include new streets, while significant buildings or land use changes in established areas may change their nature and function, requiring alterations to existing streets. Planning policies and decisions should look to create streets that support the character and use of the area. This means considering both their role as transport routes and their importance as local public spaces to accommodate non travel activities. Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through. Attractive and well-connected permeable street networks encourage more people to walk and cycle to local destinations. For this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities.

	For example, boulevards which include service lanes, can support continuous frontage development by providing direct access to buildings and the parking and place based activities they generate, whilst still providing a high level of traffic capacity within the central lanes. Similarly Home Zones are one way to achieve a good balance between the needs of the local community and drivers in residential streets, by allowing through vehicle movement at low speeds, prioritising walking and cycling as travel modes and providing space for residents to meet, relax and play. Streets should also be designed to support safe behaviours, efficient interchange between travel modes and the smooth and efficient flow of traffic. The transport user hierarchy should be applied within all aspects of street design – consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles. More people on the street can lead to improved personal security and road safety. Research shows that the presence of pedestrians causes drivers to travel more slowly and safely. Development layouts where buildings and trees frame and enclose streets, higher visual prominence of pedestrians and shorter site lines may all be helpful in supporting road safety. Roads within a development which are built to adoptable standards, rather than being locked into estate management agreements (which inhibit change), are likely to allow a greater variety of uses to be developed over time.
Title: Planning should address crime prevention **Paragraph:** 010 **Reference ID:** 26-010-20140306 **Revision Date:** 06.03.2014	Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation. Local authorities may, therefore, wish to consider how they will consult their Police and Crime Commissioners on planning applications where they are Statutory Consultees and agree with their police force how they will work effectively together on other planning matters. Crime should not be seen as a stand alone issue, to be addressed separately from other design considerations. That is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation. It is important that crime reduction-based planning measures are based upon a clear understanding of the local situation, avoiding making assumptions about the problems and their causes. Consideration also needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities. This means working closely with the police force to analyse and share relevant information and good practice. Further information can be obtained from the Police.uk website.
Title: Planning Should	Taking proportionate security measures should be a central consideration to the planning and delivery of new developments and substantive

Promote Appropriate Security Measures **Paragraph:** 011 **Reference ID:** 26-011-20140306 **Revision Date:** 06.03.2014	retrofits. Crime includes terrorism, and good counter terrorism protective security is also good crime prevention. The UK faces a significant threat from international terrorism. The current assessed threat level to the UK can be found on the MI5 website where more information can also be found on what threat levels mean, who decides the level of threat and how the threat level system is used. Where there is an identified risk, local planning authorities should work with police and other partners to ensure that an appropriate local strategy is in place to guide proposals for higher risk buildings and spaces where they exist. The objective is to create safer places and buildings that are less vulnerable to terrorist attack and, should an attack take place, where people are better protected from its impact. Pre-application discussions between security advisors such as Counter Terrorism Security Advisors and police Crime Prevention Design Advisors will ensure that applicants are aware right at the beginning of the design process of the level of risk and the sorts of measures available to mitigate this risk in a proportionate and well-designed manner. Advice on the matters to take in to account when considering the risk of terrorist attack, the proportionate response to that risk, and how best to integrate counter-terrorism protective security measures as part of good building and urban design can be found in Protecting crowded places: design and technical issues.
Title: A well designed public space is lively **Paragraph:** 018 **Reference ID:** 26-018-20140306 **Revision Date:** 06.03.2014	Public spaces are available for everyone to see, use, enjoy, (eg streets, squares and parks). They help bring neighbourhoods together, and provide space for social activities and civic life. They also provide access, light, air and the setting for buildings. The position, design and detailing of public space is central to how it provides benefits for the wider community. The most successful spaces exhibit functional and attractive hard and soft landscape elements, with well orientated and detailed routes and include facilities such as seats and play equipment. Public art and sculpture can play an important role in making interesting and exciting places that people enjoy using.
Title: Are there any conditions that apply to all advertisements? **Paragraph:** 014 **Reference ID:** 18b-014-20140306 **Revision Date:** 06.03.2014	All advertisements, whether they require consent or not, are subject to the standard conditions in Schedule 2 to the Regulations. These are: 1. no advertisement is to be displayed without the permission of the owner of the site on which they are displayed (this includes the highway authority, if the sign is to be placed on highway land); 2. no advertisement is to be displayed which would obscure, or hinder the interpretation of, official road, rail, waterway or aircraft signs, or otherwise make hazardous the use of these types of transport; 3. any advertisement must be maintained in a condition that does not impair the visual amenity of the site; 4. any advertisement hoarding or structure is to be kept in a condition which does not endanger the public; and 5. if an advertisements is required to be removed, the site must be left in a condition that does not endanger the public or impair visual amenity.

Title: In what locations are advertisements more likely to affect public safety on the roads? **Paragraph:** 067 **Reference ID:** 18b-067-20140306 **Revision Date:** 06.03.2014	All advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline.
Title: In what ways can advertisements affect railway safety? **Paragraph:** 072 **Reference ID:** 18b-072-20140306 **Revision Date:** 06.03.2014	Under certain conditions, advertisements, whether illuminated or not, can interfere with railway safety in the following ways: a. by interfering with the visibility or interpretation of fixed signals; b. by causing the illusion of a signal where no signal is situated; c. by being mistaken for hand signals; d. by interfering with warning boards, speed-restriction signs, tail-lights, or other signs or lights; e. by interfering with the visibility of level crossings; f. by interfering with the visibility of level crossing signs and signals for road and rail users. Green, yellow or red illuminated advertisements are particularly liable to cause such difficulties.
Title: What are the consultation requirements for proposed advertisements that could affect the safe operation of a railway? **Paragraph:** 073 **Reference ID:** 18b-073-20140306 **Revision Date:**	Under regulation 13(1)(d), the local planning authority must consult the person responsible for operating the railway (such as Network Rail or London Underground Limited) if it considers that granting express consent may affect the safety of persons using the railway. This includes illuminated advertisements visible from the railway track, or non-illuminated advertisements adjacent to the railway track.

06.03.2014	
Title: What does "Amenity" mean? **Paragraph:** 079 **Reference ID:** 18b-079-20140306 **Revision Date:** 06.03.2014	"Amenity" is not defined exhaustively in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It includes aural and visual amenity (regulation 2(1)) and factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest (regulation 3(2)(a)). It is, however, a matter of interpretation by the local planning authority (and the Secretary of State) as it applies in any particular case. In practice, "amenity" is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement. So, in assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features. This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site. If the advertisement makes a noise, aural amenity would also be taken into account before express consent would be given.

Health and Wellbeing

Title: What is a healthy community? **Paragraph:** 005 **Reference ID:** 53-005-20140306 **Revision Date:** 06 03 2014	A healthy community should enhance the physical and mental health of the community and, where appropriate, encourage: • Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.

London Plan (2016)

Chapter 3: London's People

Policy / paragraph	**Paragraph**

reference	
3.2 Improving Health and Addressing Health Inequalities	New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

Chapter 7: London's Living Spaces and Places

7.5 Public Realm	London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
D7	Public realm Development Plans and development proposals should: A Ensure the public realm is safe, accessible, inclusive, attractive, well connected, easy to understand and maintain, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting, street furniture and surfaces. B Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds. C Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists. D Ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings. E Ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm. F Ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.

	G Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter. H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity. I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused. J Explore opportunities for innovative approaches to improving the public realm such as open street events. K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm. L Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible. M Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm.

Supplementary Planning Guidance (SPG)

All Green London Grid (2012)

Paragraph Reference	Paragraph
5.191 Strategic Green Infrastructure Opportunities: 11	Create new public realm and green space, including green roofs, as an integrated part of major infrastructure schemes, including Crossrail and the Thames Tideway Tunnel, ensuring that they are connected to the existing green space network to encourage walking and cycling.

Sustainable Design and Construction (2014)

2.8.12	The potential to increase biodiversity in public realm improvements should be maximised. The ecological enhancement of urban greening measures in the public realm can in particular increase the connectivity between existing areas of urban habitat.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text

Principle D1	Proposals should improve existing street environments and create a new network of streets that will help overcome severance and connect existing and future communities by: a. delivering a defined and permeable urban grain and a legible urban block pattern; b. creating new and improving existing streets to be safe, comfortable and attractive for walking and cycling, with links to off-highway routes such as towpaths, and support elements of play; c. delivering active frontages and/or residential uses at ground level in most locations where feasible; d. strengthening the identity and legibility of stations (according with guidance such as TfL Station Public Realm Design Guidance) and town centres; and e. delivering a high quality, robust public realm with a clear management and maintenance strategy

Regulation 18 Policy Options

Policy	Paragraph Reference	Paragraph
D2. Public Realm	6.22	In light of the strong national and regional guidance and the requirement of the London Plan to deliver optimum development densities supported by high quality public realm, alternative policy options were not considered to be appropriate.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Amount and types of open space: Policy D3 should specific quantum and range of open space needed to meet the needs of the new community. Open spaces should provide a range of roles including for attractions, social gatherings, biodiversity/nature, community events, street markets and quiet places.	Brent Council, Diocese of London, Grand Union Alliance, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 4 local residents	Change proposed. Policy EU1 (which supersedes D3) identifies that outside of Strategic Industrial Location (SIL), development should look to deliver a minimum 30% of the area as publicly accessible open space. The policy sets out that this should be delivered through local parks in locations identified in the places chapter, smaller open spaces, green streets and where it is not possible or desirable to deliver 30%, a contribution in lieu would be

		sought.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Policy is too restrictive on requirements for unrestricted public access. There may be instances where open space within a development scheme can also form part of the public realm but it is appropriate to limit public access.	Castlepride Limited	No change proposed. OPDC considers Policy D2 to enable sufficient provision for publicly assessible private realm to be closed for management and safety purposes while ensuring provision of open space is optimised across the OPDC area. This is in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7.
Policy should refer to Healthy Streets approach.	Transport for London (Group Planning)	Change proposed. OPDC considers references to Healthy Streets would be appropriate to help deliver the Mayor's aspirations for health and well being. Policy D2 has been amended accordingly.
Public access to private realm is dependent on phasing and should be determined through a S106 agreement. This part of the policy should be removed	Old Oak Park Limited	No change proposed. OPDC considers Policy D2 to enable sufficient provision for publicly assessible private realm to be closed for management and safety purposes while ensuring provision of open space is optimised across the OPDC area. This is in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7.
Requirements to provide details of cleaning and maintenance is too detailed for outline planning applications where design details may not have been finalised. This part of the policy should be removed.	Old Oak Park Limited	Change proposed. OPDC considers it appropriate to reflect the type of planning application in requirements for management and maintenance strategies. The supporting text has been amended accordingly.
Policy is unsound	Sarah Abrahart	No change proposed OPDC considers D2 is sound.
Support for Policy	Hammersmith Society, Wells House Road Residents	Noted.

	Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Canary Wharf, the Olympic Park and Royal Borough of Kensington and Chelsea also provide good precedents for public realm. OPDC should consider prepare guidance on the choice of materials and standard designs for hard landscaping.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is currently considering whether to develop public realm supplementary guidance following adoption of the Local Plan.
Need to be clearer about the need for public realm to be genuinely public.	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D2 provides guidance ensuring public access to privately owned public realm in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7. The ownership of open space will be considered on a case by case basis in discussion with relevant stakeholders including boroughs.
Figure 5.3 Elephant and Castle is an appropriate precedent.	Regents Network	Noted.
North Acton has poor quality public realm. This sets a poor precedent for the rest of the OPDC area and does not accord with NPPF para 58.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP2, SP9, D2 and P7 provide guidance to delivery new high quality public realm and improve the existing public realm of North Acton.
Developer led public realm needs coordination by OPDC	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy D2 provides policy to ensure public realm across different land ownerships is coordinated.

Lunchtime spaces needed. Canal public realm needs to be improved.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy P3, P4, P5 and P6 provide policy for delivering new and improved public realm in Park Royal and along the Grand Union Canal.
Suggested public realm activation could include a range of activities for all ages.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy D3 provides policy for delivering accessible and inclusive public realm with Policy D9 also providing guidance for delivering play and recreation for all ages.
Mode separation is required for all transport types.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy T1 provides guidance for movement functions of streets and the public realm. Policy T1 ensures all new streets are built and designed in accordance wih all relevant standards, appropriate to local characteristics and demands. Policies T2 and T3 provide guidance for delivering safe and secure walking and cycling routes.
Permeability and legibility need to be balanced with street enclosure vs. legibility	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies D2, D4, D5, D6 and SP9 provide a policy approach that provides the tools to balance local character, amenity of the public realm, built form and legibility.
A balance of roles of public realm for local services vs destination areas is required.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies D2, TCC8 and Place Policies provide guidance to deliver multi-functional public realm including a range of roles.

Landscaping strategy is required	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is currently considering whether to develop public realm supplementary guidance following adoption of the Local Plan.This may include specific landscaping guidance.
Connections to surrounding areas is key	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP7 and T1 provide policies for delivering connections to surrounding areas.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Character Areas Study	• Elements are identified for each character area which should be retained or responded to as part of any future development. • A level of potential impact on character is identified for each character area, taking into account the value of existing character and potential impact from future development. • For areas within the OPDC area, character issues to address through future policy interventions or development are identified. • Outlines specific character based recommendations for adding value to public realm.
Environmental Standards Study	• Outlines objectives for integrating high standards of environmental sustainability into the public realm.
Precedents Study	• Lessons learnt from King's Cross, Elephant and Castle Regeneration, Barking Town Centre, Bankside Regeneration, Highgate Shoreditch Hotel, Granary Wharf and Utrecht Centraal Station on how to deliver high quality public realm in high density developments.
Public Realm, Walking and Cycling Strategy	• Recognises that a high quality public realm that is focused on walking and cycling – as set out in the Mayor's vision for 'Healthy Streets' – is central to London becoming a healthier, cleaner and more vibrant city. • Makes 10 recommendations for improving public realm, walking and cycling in Old Oak and Park Royal. • Key outputs include:

	a. Public Realm Assessment b. Public Realm Strategy
Old Oak North Development Framework Principles	• Provides guidance for the form and function of public realm and streets across Old Oak North.
Scrubs Lane Development Framework Principles	• Provides guidance for form and function of public realm along Scrubs Lane.
Victoria Road and Old Oak Lane Development Framework Principles	• Provides guidance for form and function of public realm within North Acton, Acton Wells and along Victoria Road and Old Oak Lane.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D3. Accessible and Inclusive Design

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Paragraph Reference	Paragraph
35	Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to: … • consider the needs of people with disabilities by all modes of transport.
57.	It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
58.	Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
61	Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
69.	The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Planning policies and decisions, in turn, should aim to achieve places which promote: • Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

National Planning Practice Guidance (NPPG)

7. Requiring Good Design

Paragraph Reference	Paragraph
Title: Planning should promote a network of green spaces (including parks) and public places **Paragraph:** 009	Development should promote public spaces and routes that are attractive, accessible, safe, uncluttered and work effectively for all users – including families, disabled people and elderly people. A system of open and green spaces that respect natural features and are easily accessible can be a valuable local resource and helps create successful places. A high quality landscape, including trees and semi-natural habitats where appropriate, makes an important contribution to the quality of an area.

Reference ID: 26-009-20140306 **Revision Date:** 06.03.2014	
Title: Planning Should Promote Access and Inclusion **Paragraph:** 012 **Reference ID:** 26-012-20140306 **Revision Date:** 06.03.2014	Good design can help to create buildings and places that are for everyone. Planning can help break down unnecessary physical barriers and exclusions caused by the poor design of buildings and places.
Title: Planning should promote access and inclusion **Paragraph:** 012 **Reference ID:** 26-012-20140306 **Revision Date**: 06.03.2014	An inclusive environment is one that can be accessed and used by everyone. It recognises and accommodates differences in the way people use the built environment. Good design can help to create buildings and places that are for everyone. Planning can help break down unnecessary physical barriers and exclusions caused by the poor design of buildings and places. Inclusive design acknowledges diversity and difference and is more likely to be achieved when it is considered at every stage of the development process, from inception to completion. However it is often mistakenly seen as a Building Regulations issue, to be addressed once planning permission has been granted, not at the planning application stage. The most effective way to overcome conflicting policies and to maximise accessibility for everyone is for all parties to consider inclusive design from the outset of the process. This is particularly important when considering historic buildings and conservation, and highways. Thinking at the design stage about how the completed building will be occupied and managed can overcome many barriers experienced by some users. Too often the needs of users, including disabled people, older people and families with small children, are considered too late in the day. Inclusive design should not only be specific to the building, but also include the setting of the building in the wider built environment, for example, the location of the building on the plot; the gradient of the plot; the relationship of adjoining buildings; and the transport infrastructure. Issues to consider include: • proximity and links to public transport; • parking spaces and setting down points in proximity to entrances; • the positioning and visual contrast of street furniture and the design of

	approach routes to meet the needs of wheelchair users and people with visual impairments; and • whether entrances to buildings are clearly identified, can be reached by a level or gently sloping approach and are well lit.

London Plan (2016)

Chapter 2: London's Places

Paragraph Reference	Paragraph
2.13 Opportunity Areas and Intensification Areas	Realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking
2.15 Town Centres	Provide the structure for sustaining and improving a competitive choice of goods and services conveniently accessible to all Londoners.

Chapter 3: London's People

3.2 Improving Health and Addressing Health Inequalities	Boroughs should: • Promote the effective management of places that are safe, accessible and encourage social cohesion
3.16 Protection and Enhancement of Social Infrastructure	Facilities should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged. Boroughs should develop a criteria-based approach to the provision of different types of social infrastructure facilities and the expansion of existing facilities, taking into account the location and layout of facilities. Facilities should be: • Easily accessible to all sections of the community (including disabled people and older people) by meeting inclusive design principles

Chapter 6: London's Transport

6.1 Strategic Approach	A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in **Table 6.1** and by: j seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable.

Chapter 7: London's Living Spaces and Places

7.1 Lifetime Neighbourhoods (Supporting Text: 7.4)	People should be able to live and work in a safe, healthy, supportive and inclusive neighbourhood with which they are proud to identify.
7.2 An Inclusive Environment	The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments: a. Can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances b. Are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment. c. Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways. d. Are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG1	Building strong and inclusive communities To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city. B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation. C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish. D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time. E Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements. F Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.
D3	Inclusive design A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:

	1) can be entered and used safely, easily and with dignity by all 2) are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment 3) are designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building. B The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.

Supplementary Planning Guidance (SPG)

Accessible London: Achieving an Inclusive Environment (2014)

Paragraph Reference	Paragraph
SGP Implementation Point 2: The Principles of Inclusive Design	The Mayor has adopted the social model of disability and the principles of inclusive design underpin his approach to planning. To achieve an accessible and inclusive environment consistently throughout London, the Mayor recommends that boroughs and developers understand and adopt this approach and address the physical and social barriers that can prevent people participating and making a full contribution to the economic success of their city.

All London Green Grid (2012)

2.2	The ALGG promotes the creation of a high quality multifunctional green infrastructure network that maximizes the opportunities for improving quality of life and contributes to implementing a range of policies in the London Plan. The network includes open spaces, corridors and the links in between, of varying size and character, often with cultural and heritage value. The linkages can be the wider public realm, corridors along transport routes, footpaths and cycle ways.

Character and Context (2014)

2.15	Integrate inclusive design principles to ensure that the area can be used safely, easily and with dignity by all.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Principle D1	Proposals should improve existing street environments and create a new network of streets that will help overcome severance and connect existing

	and future communities by: a. delivering a defined and permeable urban grain and a legible urban block pattern; b. creating new and improving existing streets to be safe, comfortable and attractive for walking and cycling, with links to off-highway routes such as towpaths, and support elements of play; c. delivering active frontages and/or residential uses at ground level in most locations where feasible; d. strengthening the identity and legibility of stations (according with guidance such as TfL Station Public Realm Design Guidance) and town centres; and e. delivering a high quality, robust public realm with a clear management and maintenance strategy

Local Plan Regulation 18 Draft Policy Options

Policy	Paragraph Reference	Paragraph
D3. Accessible and Inclusive Design	6.30	In light of the strong national and regional guidance and the requirement of the London Plan to deliver optimum development densities supported by high quality public open space, alternative policy options were not considered to be appropriate.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Accessibility and inclusivity: The Local Plan does not sufficiently demonstrate to developers why proposals should be accessible and inclusive. Policy D8 should reinforce London Plan policy. OPDC should establish a Strategic Access Panel and/or invite local access groups to review major planning applications.	Hammersmith and Fulham Disability Forum, GLA	Noted. The Local Plan is being drafted to ensure conformity with London Plan policy 7.2 'An inclusive environment'. As part of OPDC's development plan this policy, alongside the Accessible London SPG and relevant guidance in the Housing SPG, will be utilised to determine planning applications. To ensure detailed consideration of access matters are considered in proposals, the OPDC Place Review Group has specific expert representation in

		accessible and inclusive design. The spatial vision references the importance of creating an accessible and inclusive development. This is further asserted in Policy SP9 (Built Environment) and in Policy D3 (Accessible and Inclusive Design).

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Figure 5.4: Peter's Hill is not an appropriate precedent.	Regents Network	No change proposed. OPDC considers Peter's Hill to be an appropriate precedent.
Refer to different ages of the community and ensure development is designed to enable activity for the elderly.	Grand Union Alliance, Bini Ghebreyes, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Age is one of the elements required to be considered in delivering accessible and inclusive design within the Mayor's Accessible London SPG. Policy D3 seeks to deliver development that is compliant with the latest guidance on accessible and inclusive design as an integral part of their design. As such considering age is addressed in Policy D3.
Refer to income levels.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D3 refers to all users which encompasses different income levels.
Refer to changing needs	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC considers it appropriate to refer to the changing needs of people to delivery an accessible and inclusive environment. Policy D3 has been amended accordingly.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendation
Precedents Study	• Lessons learnt from King's Cross, Hudson Yards, Wood Wharf, Bankside Regeneration, Highgate Shoreditch Hotel, Aldgate Place, The Plimsoll Building, Micawber Street, 5 Pancras Square, Tumbling Park Playground, Shoreditch High Street Station and Box Park and Tassinge Square on how to deliver high quality accessible and inclusive space in high density developments.
Public Realm, Walking and Cycling Strategy	• Makes proposed network recommendations for providing inclusivity and accessible open spaces in Old Oak and Park Royal.
Old Oak North Development Framework Principles	• Provides guidance to deliver key routes at 1:20 gradient or better. Where this is demonstrated not to be achievable to cross barriers, alternative options are proposed such as high quality, safe, 24 hour public lifts.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D4. Well-Designed Buildings

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Paragraph Reference	Paragraph
17	Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
57	It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings**,** public and private spaces and wider area development schemes.
60	Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.
61.	Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
69	Planning policies and decisions, in turn, should aim to achieve places which promote: safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
Title: What Should Good Design Achieve? **Paragraph:** 002 **Reference ID:** 26-002-20140306	Good design should… • Enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well-being.

Revision Date: 06.03.2014	
Title: Planning should promote local character (including landscape setting) **Paragraph:** 007 **Reference ID:** 26-007-20140306 **Revision Date:** 06.03.2014	Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation. The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre. When thinking about new development the site's land form should be taken into account. Natural features and local heritage resources can help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place. Views into and out of larger sites should also be carefully considered from the start of the design process. Local building forms and details contribute to the distinctive qualities of a place. These can be successfully interpreted in new development without necessarily restricting the scope of the designer. Standard solutions rarely create a distinctive identity or make best use of a particular site. The use of local materials, building methods and details can be an important factor in enhancing local distinctiveness when used in evolutionary local design, and can also be used in more contemporary design. However, innovative design should not be discouraged. The opportunity for high quality hard and soft landscape design that helps to successfully integrate development into the wider environment should be carefully considered from the outset, to ensure it complements the architecture of the proposals and improves the overall quality of townscape or landscape. Good landscape design can help the natural surveillance of an area, creatively help differentiate public and private space and, where appropriate, enhance security.
Title: Planning should address crime prevention **Paragraph:** 010 **Reference ID:** 26-010-20140306 **Revision Date:** 06.03.2014	Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation. Local authorities may, therefore, wish to consider how they will consult their Police and Crime Commissioners on planning applications where they are Statutory Consultees and agree with their police force how they will work effectively together on other planning matters. Crime should not be seen as a stand alone issue, to be addressed separately from other design considerations. That is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation. It is important that crime reduction-based planning measures are based upon a clear understanding of the local situation, avoiding making assumptions about the problems and their causes. Consideration also

	needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities. This means working closely with the police force to analyse and share relevant information and good practice. Further information can be obtained from the Police.uk website.
Title: Planning Should Promote Appropriate Security Measures **Paragraph:** 011 **Reference ID:** 26-011-20140306 **Revision Date:** 06.03.2014	Taking proportionate security measures should be a central consideration to the planning and delivery of new developments and substantive retrofits. Crime includes terrorism, and good counter terrorism protective security is also good crime prevention. The UK faces a significant threat from international terrorism. The current assessed threat level to the UK can be found on the MI5 website where more information can also be found on what threat levels mean, who decides the level of threat and how the threat level system is used. Where there is an identified risk, local planning authorities should work with police and other partners to ensure that an appropriate local strategy is in place to guide proposals for higher risk buildings and spaces where they exist. The objective is to create safer places and buildings that are less vulnerable to terrorist attack and, should an attack take place, where people are better protected from its impact. Pre-application discussions between security advisors such as Counter Terrorism Security Advisors and police Crime Prevention Design Advisors will ensure that applicants are aware right at the beginning of the design process of the level of risk and the sorts of measures available to mitigate this risk in a proportionate and well-designed manner. Advice on the matters to take in to account when considering the risk of terrorist attack, the proportionate response to that risk, and how best to integrate counter-terrorism protective security measures as part of good building and urban design can be found in Protecting crowded places: design and technical issues.
Title: Consider layout **Paragraph:** 024 **Reference ID:** 26-024-20140306 **Revision Date:** 06.03.2014	This is how buildings, street blocks, routes and open spaces are positioned in an area and how they relate to each other. This provides the basic plan for development. Developments that endure have flexible layouts and design. New development should look to respond appropriately to the existing layout of buildings, streets and spaces to ensure that adjacent buildings relate to each other, streets are connected, and spaces complement one another. The layout of areas, whether existing or new, should be considered in relation to adjoining buildings, streets and spaces; the topography; the general pattern of building heights in the area; and views, vistas and landmarks into and out of the development site. There may be an existing prevailing layout that development should respond to and potentially improve. Designs should ensure that new and existing buildings relate well to each other, that streets are connected, and spaces complement one another. This could involve following existing building lines, creating new links between existing streets or providing new public spaces. In general urban block layouts provide an efficient template with building

	fronts and entrances to public spaces and their more private backs to private spaces. Such layouts minimise the creation of unsupervised and unsafe public spaces and unsafe access routes. However building frontages do not have to be continuous or flat. Breaks and features particularly where they emphasise entrances, can be successfully incorporated. There should be a clear definition between public and private space. A buffer zone, such as a front garden, can successfully be used between public outdoor space and private internal space to support privacy and security.
Title: Consider form **Paragraph:** 025 **Reference ID:** 26-025-20140306 **Revision Date:** 06.03.2014	Buildings can be formed in many ways, for example tall towers, individual stand alone units, long and low blocks, terraces. They can all be successful, or unsuccessful, depending on where they are placed, how they relate to their surroundings, their use and their architectural and design quality. Similarly streets can take different forms. From wide motorways with few entrances and exits to narrow lanes with many buildings accessed directly from them. Care should be taken to design the right form for the right place. Some forms pose specific design challenges, for example how taller buildings meet the ground and how they affect local wind and sunlight patterns should be carefully considered. The length of some lower blocks can mean they disrupt local access and movement routes. Stand alone buildings can create ill defined spaces around them and terraces can appear monotonous and soulless if poorly designed.
Title: Consider scale **Paragraph:** 026 **Reference ID:** 26-026-20140306 **Revision Date:** 06.03.2014	This relates both to the overall size and mass of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. Decisions on building size and mass, and the scale of open spaces around and between them, will influence the character, functioning and efficiency of an area. In general terms too much building mass compared with open space may feel overly cramped and oppressive, with access and amenity spaces being asked to do more than they feasibly can. Too little and neither land as a resource or monetary investment will be put to best use. The size of individual buildings and their elements should be carefully considered, as their design will affect the: overshadowing and overlooking of others; local character; skylines; and vistas and views. The scale of building elements should be both attractive and functional when viewed and used from neighbouring streets, gardens and parks. The massing of development should contribute to creating distinctive skylines in cities, towns and villages, or to respecting existing skylines. Consideration needs to be given to roof space design within the wider context, with any adverse visual impact of rooftop servicing minimised. Account should be taken of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.
Title: Consider details	The quality of new development can be spoilt by poor attention to detail. Careful consideration should be given to items such as doors, windows,

Paragraph: 027 **Reference ID:** 26-027-20140306 **Revision Date:** 06.03.2014	porches, lighting, flues and ventilation, gutters, pipes and other rain water details, ironmongery and decorative features. It is vital not only to view these (and other) elements in isolation, but also to consider how they come together to form the whole and to examine carefully the 'joins' between the elements.
Title: Planning Should Promote Efficient use of Natural Resources **Paragraph:** 013 **Reference ID:** 26-013-20140306 **Revision Date:** 06.03.2014	The layout and design of buildings and planting can reduce energy and water use and mitigate against flooding, pollution and over-heating.
Title: A Well Designed Place is Adaptable and Resilient **Paragraph:** 019 **Reference ID:** 26-019-20140306 **Revision Date:** 06.03.2014	Buildings often need to change their use over time, for example from offices to housing. Designing buildings that can be adapted to different needs offers real benefits in terms of the use of resources and the physical stability of an area. Design features such as the position and scale of entrances and circulation spaces, and the ability of the construction to be modified, can affect how easily buildings can adapt to new demands.
Title: Town Centre Issues **Paragraph:** 041 **Reference ID:** 26-041-20140306 **Revision Date:** 06.03.2014	Town centre buildings should include active frontages and entrances that support town centre activities. Where appropriate they may help to diversify town centre uses and the offers they provide. The quality of signage, including that for shops and other commercial premises, is important and can enhance identity and legibility.

Title: How can planning help create a healthier food environment? **Paragraph:** 006 **Reference ID:** 53-006-20170728 **Revision Date:** 28 07 2017	Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.

London Plan (2016)

Chapter 7: London's Living Spaces and Places

Paragraph Reference	Paragraph
7.1 Lifetime Neighbourhoods	The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.
7.3 Designing Out Crime	Places, buildings and structures should incorporate appropriately designed security features.
7.4 Local Character	Buildings, streets and open spaces should provide a high quality design response that: a. Has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass b. Contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area c. Is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings d. Allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area e. Is informed by the surrounding historic environment.
7.6 Architecture	Buildings and structures should: a. Be of the highest architectural quality b. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm c. Comprise details and materials that complement, not necessarily replicate, the local architectural character d. Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
D1	London's form and characteristics Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10)facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D4	Housing quality and standards A To optimise the development of housing on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of this policy, including minimum space

	standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures. B New homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. Particular account should be taken of the needs of children, disabled and older people. C Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments. D Housing developments are required to meet the minimum standards below. These standards apply to all tenures and all residential accommodation that is self-contained. Private internal space 1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1. 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide. 3) A one bedspace single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide. 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sqm. 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sqm within the Gross Internal Area). 6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all. 7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any builtin area in excess of 0.72 sqm in a double bedroom and 0.36 sqm in a single bedroom counts towards the built-in storage requirement. 8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. Private outside space 9) A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1. 10) The minimum depth and width for all balconies and other private external spaces should be 1.5m. E Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London's form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating. F The design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of

	outside amenity space. G Dwellings should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food. The Mayor will produce guidance on the implementation of this policy for all housing tenures.
D6	Optimising housing density A Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to: 1) the site context 2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) 3) the capacity of surrounding infrastructure. Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused. B The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth. 1) The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels. 2) The ability to support proposed densities through encouraging active travel should be taken into account. 3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly. C The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above: 1) 110 units per hectare in areas of PTAL 0 to 1; or 2) 240 units per hectare in areas of PTAL 2 to 3; or 3) 405 units per hectare in areas of PTAL 4 to 6. D The following measures of density should be provided for all planning applications that include new residential units: 1) number of units per hectare 2) number of habitable rooms per hectare 3) number or bedrooms per hectare 4) number of bedspaces per hectare. E The following additional measures should be provided for all major planning applications : 1) the Floor Area Ratio (total Gross External Area of all floors / site area)

	2) the Site Coverage Ratio (Gross External Area of ground floors /site area) 3) the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level). These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.
D10	Safety, security and resilience to emergency The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register. A Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment. B Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
D11	Fire safety A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they: 1) are designed to incorporate appropriate features which reduce the risk to life in the event of a fire 2) are constructed in an appropriate way to minimise the risk of fire spread 3) provide suitable and convenient means of escape for all building users 4) adopt a robust strategy for evacuation which all building users can have confidence in 5) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of: 1) the building's construction: methods, products and materials used 2) the means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated management plan approach 3) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the

	ongoing maintenance and monitoring of these 4) how provision will be made within the site to enable fire appliances to gain access to the building.

Supplementary Planning Guidance (SPG)

Sustainable Design and Construction (2014)

Paragraph Reference	Paragraph
2.1.1.	Buildings and their surrounding should be designed and built to improve the local and wider environment and minimise their demand on wider resources including land, energy, water and materials. This also helps to minimise the need for expensive physical infrastructure.
2.3.3.	The construction of new buildings is a major consumer of resources and can produce large quantities of waste and carbon dioxide emissions as well as contribute towards poor air quality. Developers should carefully consider the potential to retain existing buildings, including through their conversion, refurbishment and extension. Where possible, sustainable measures should be retrofitted into existing buildings.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Principle D3	Proposals should accord with London Plan policies 2.13, 7.6 and 7.7 and deliver: a. a world class exemplary architecture that contributes to the delivery of Lifetime Neighbourhoods; b. a positive contribution to the creation of a coherent public realm, streetscape and wider cityscape; c. greater heights and densities than the surrounding existing context to optimise the use of land in accordance with London Plan policy 2.13(B); d. taller buildings and higher densities should primarily be focussed at stations and other key destinations. There may also be opportunities for some taller elements in other locations so long as such proposals contribute to the creation of a coherent place and accord with the guidance set out in this planning framework; and e. new development should be mindful of their context and in particular sensitive locations in the surrounding area. In these locations lower densities may be more appropriate and applicants will be expected to demonstrate how their development proposals achieve such sensitive design. This is likely to require the highest standards of design.

Regulation 18 Policy Options

Policy	Paragraph Reference	Paragraph
D4. Well Designed Buildings	6.43	In light of the detailed national and regional guidance, specific alternative policies were not considered to be appropriate.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Wells House Road Residents Association, 1 local resident.	**Design experience:** OPDC Planning Committee should consider including members with a design background.	Noted. The make-up of the Planning Committee is determined by OPDC Board.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Welcome any changes to the plan that will improve fire safety for the future residents	Hammersmith and Fulham Council	Change proposed. OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect draft London Plan policy and Building Regulations requirements.
Principles of circular economy should also be included in D4: Well Design Buildings.	LWARB	No change proposed. Policy EU7 provides guidance for delivering the principles of the Circular Economy within development.
Add another requirement to deliver urban greening onto suitable surfaces, including vertical greening.	London Borough of Hammersmith and Fulham	No change proposed. Policy EU2 provides guidance for delivering urban greening within development.
Policy is unsound, unjustified and unclear	Arnaud Demas, Sarah Abrahart	No change proposed. OPDC considers D4 is sound.
Plan will result in overdevelopment.	Ron Thorp	No change proposed. Local Plan policies, London Plan policies, national guidance and other material considerations will be used to deliver a high quality high

		density environment.
Support policy, but have concerns regarding how designs will be assessed.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.
Generally, support D4 but towers cannot respond positively to character or make a positive contribution to the townscape.	Regents Network	No change proposed. Local Plan policies SP9, D2, D4, D5, current and draft London Plan policies provide guidance for ensuring tall buildings respond positively to character and make a positive contribution to townscape. OPDC considers that tall buildings, if well designed and in the right location, can contribute to local character and positively contribute to the skyline.
Figure 5.5: Trafalgar Place, Elephant and Castle is a better precedent but it lacks 'homeliness'	Regents Network	Noted. OPDC considers Trafalgar Place is an appropriate precedent.
Policy should reflect NPPF para 66 requiring applicants to evolve designs with input from the community.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D1 provides guidance for ensuring designs respond to views of the community in accordance with OPDC's Statement of Community Involvement.
Play space should not be on roofs	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D9 requires child play space to be delivered in accordance with the latest OPDC and GLA guidance. The Mayor of London's Play and Recreation SPG states that "In new developments, the use of roofs and terraces may provide an alternative to ground floor open space where they are safe, large enough, attractive and suitable for children to play, careful consideration should

		be given to these options, including the need for supervision and any restrictions that this might put on the use of the facilities" and "the use of roofs, terraces and indoor space can be an alternative to ground floor open space but issues about safety and supervision should be given careful consideration". As such, play space at roof level could be appropriate subject to meeting requirements set out in the Local Plan, London Plan and the Play and Recreation SPG.
Do not support use of excessive glass in the developments	Regents Network	Noted. Policy D6 provides guidance for considering the impact of light on amenity of building users and the public realm.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Character Areas Study	• Elements are identified for each character area which should be retained or responded to as part of any future development. • A level of potential impact on character is identified for each character area, taking into account the value of existing character and potential impact from future development. • For areas within the OPDC area, character issues to address through future policy interventions or development are identified.
Circular and Sharing Economy Study	• Explores opportunities for the application of CSE to new developments in OPDC. It recommends that CSE innovation is adopted in building design. • On the Old Oak and Park Royal area, buildings, infrastructure, spaces and services shall be designed to be adaptable and flexible for different lifespans and changing uses, rather than one fixed end use.
Environmental Modelling Framework Study	• There are no existing definitive standards. The nature and density of development will place big challenges on the quality of the environment including access to daylight and sunlight and changes to the micro climate and wind regime. The tools that are used have been developed for much less dense and tall development. • New parametric modelling should therefore be adopted to test outline development proposals and detailed planning applications to ensure

	that they meet minimum standards. 1 New standards should be adopted but this should be done with caution and as development comes forward assessments during the design phase and then in occupation should be undertaken to hone these standards.
Environmental Standards Study	• High density development poses significant challenges to the quality of development in Old Oak and Park Royal. The adoption of short, medium and long term targets should inform all development and applied rigorously or the overall quality of the development and its impact on London could be significant.
Heritage Strategy	• Provides a deeper understanding of the historical development and significance of the Old Oak and Park Royal Area by identifying historic themes and character areas. • Sets out recommendations for designated and undesignated buildings, historic themes that require consideration in the Local Plan and the masterplan, sensitive areas and heritage assets. • Understanding this gives the proposed developments an opportunity to reflect the areas heritage and character through public realm and well-designed buildings.
Precedents Study	• Takes lessons from local and international schemes relevant to the type of development envisioned within the OPDC area on how to deliver well-designed new buildings.
Views Study	• Use views to assist wayfinding in a chaotic environment • Opportunities to see buildings of interest are generally oblique or glancing views; these need to be preserved. • Developers will need to agree with Planning Authority which views are relevant to their proposal • Heritage views development guidelines need to be adhered to.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D5. Tall Buildings

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

7. Requiring Good Design

Paragraph Reference	Paragraph
58.	Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments: • Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. • Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. • Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks. • Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. • Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. • Are visually attractive as a result of good architecture and appropriate landscaping.

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
Title: Consider Form **Paragraph:** 025 **Reference ID:** 26-025-20140306 **Revision Date:** 06.03.2014	Buildings can be formed in many ways, for example tall towers, individual stand-alone units, long and low blocks, terraces. They can all be successful, or unsuccessful, depending on where they are placed, how they relate to their surroundings, their use and their architectural and design quality. Some forms pose specific design challenges, for example how taller buildings meet the ground and how they affect local wind and sunlight patterns should be carefully considered. The length of some lower blocks can mean they disrupt local access and movement routes. Stand-alone buildings can create ill-defined spaces around them and terraces can appear monotonous and soulless if poorly designed**.**

Title: What is meant by the term public benefits? **Paragraph:** 020 **Reference ID:** 18a-020-20140306 **Revision Date:** 06.03.2014	Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Public benefits may include heritage benefits, such as: • sustaining or enhancing the significance of a heritage asset and the contribution of its setting • reducing or removing risks to a heritage asset • securing the optimum viable use of a heritage asset in support of its long term conservation
Title: Consider scale **Paragraph:** 026 **Reference ID:** 26-026-20140306 **Revision Date:** 06.03.2014	This relates both to the overall size and mass of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. Decisions on building size and mass, and the scale of open spaces around and between them, will influence the character, functioning and efficiency of an area. In general terms too much building mass compared with open space may feel overly cramped and oppressive, with access and amenity spaces being asked to do more than they feasibly can. Too little and neither land as a resource or monetary investment will be put to best use. The size of individual buildings and their elements should be carefully considered, as their design will affect the: overshadowing and overlooking of others; local character; skylines; and vistas and views. The scale of building elements should be both attractive and functional when viewed and used from neighbouring streets, gardens and parks. The massing of development should contribute to creating distinctive skylines in cities, towns and villages, or to respecting existing skylines. Consideration needs to be given to roof space design within the wider context, with any adverse visual impact of rooftop servicing minimised. Account should be taken of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.

London Plan (2016)

Chapter 7: London's Living Spaces and Places

Paragraph Reference	**Paragraph**
7.6 Architecture	Buildings and structures should: • Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.
7.7	**Strategic**

Location and Design of Tall and Large Buildings	A. Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. **Planning Decisions** B. Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria below. This is particularly important if the site is not identified as a location for tall or large buildings in the borough's LDF. C. Tall and large buildings should: a. Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport b. Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building c. Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level; d. Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London e. Incorporate the highest standards of architecture and materials, including sustainable design and construction practices f. Have ground floor activities that provide a positive relationship to the surrounding streets g. Contribute to improving the permeability of the site and wider area, where possible h. Incorporate publicly accessible areas on the upper floors, where appropriate i. Make a significant contribution to local regeneration. D. Tall buildings: a. Should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference. b. Should not impact on local or strategic views adversely. E. The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	Making the best use of land To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus

	public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.
D8	D8 Tall buildings Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following: Definition A Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London. Tall building locations B Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of: 1) the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below) 2) their potential contribution to new homes, economic growth and regeneration 3) the public transport connectivity of different locations. Impacts C The impacts of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals: 1) Visual impacts a) The views of buildings from different distances need to be considered, including: i Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views ii Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions

	of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality iii Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. b) Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding c) Architectural quality and materials should be of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its lifespan d) Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area e) Buildings in the setting of a World Heritage Site must preserve the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it f) Buildings near the River Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river g) Buildings should not cause adverse reflected glare. 2) Functional impact a) The internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants b) Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process c) Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas d) It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building e) Infrastructure improvements required as a result of the development should be delivered and phased appropriately f) Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of

	the development as a catalyst for further change in the area g) Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings. 3) Environmental impact a) Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building b) Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect streetlevel conditions c) Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building. 4) Cumulative impacts a) The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting. Public access D Publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
Principle D3	Proposals should accord with London Plan policies 2.13, 7.6 and 7.7 and deliver: a. a world class exemplary architecture that contributes to the delivery of Lifetime Neighbourhoods; b. a positive contribution to the creation of a coherent public realm, streetscape and wider cityscape; c. greater heights and densities than the surrounding existing context to optimise the use of land in accordance with London Plan policy 2.13(B); d. taller buildings and higher densities should primarily be focussed at stations and other key destinations. There may also be opportunities for some taller elements in other locations so long as such proposals contribute to the creation of a coherent place and accord with the guidance set out in this planning framework; and e. new development should be mindful of their context and in particular sensitive locations in the surrounding area. In these locations lower densities may be more appropriate and applicants will be expected to demonstrate how their development proposals achieve such sensitive design. This is likely to require the highest standards of design.

Local Plan Regulation 18 Draft Policy Options

Paragraph Reference	Paragraph
N/A	N/A

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Local context: Policy D4 should set out that development should reflect existing local context	Hammersmith and Fulham Historic Buildings Group, 12 local residents	No change proposed. Policy SP9 requires development to respond to local character and context but 'reflecting' local context would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities and tall buildings.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Generally, support approach to tall buildings, but suggest additional sites not currently identified, including 19 Abbey Road, which would be suitable for tall buildings.	T.A.S.B. Investments Limited	No change proposed. The Local Plan provides guidance for the location of tall buildings in accordance with Draft New London Plan policy D8. This coordinates information from a range of supporting studies and a review or precedent developments to define locations where tall buildings are an appropriate form of development in principle.
Use of term "outstanding" for measuring tall building design is too subjective.	Castlepride Limited	Noted. This element of the policy has been removed to avoid repetition of Draft New London Plan Policy D8.
Clarification sought for statement setting out how development will deliver significant benefits in accordance with paragraph	Old Oak Park Limited	No change proposed. Policy D5 and policies supporting text identify potential significant benefits. Securing benefits and defining their

5.41.		delivery will be carried out on a site by site basis.
Too many tall buildings are proposed.	Ron Thorp	No change proposed. The Local Plan provides guidance for a range of building heights based on supporting evidence studies. Policies SP2, SP9, D4, D5, D6 and Place Policies provide guidance for delivering high quality high density development including tall buildings.
Heights are driven by untested London Plan development capacities. This is demonstrated by tall buildings planned along Scrubs Lane. Rationale is not justified.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the homes and jobs targets for each place are justified. These are based on development capacity information set out in OPDC's Development Capacity Study. This has been developed in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. The Development Capacity Study is based on development capacity information set out in the Old Oak North Development Framework Principles the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document provided specific information for development capacity for the Development Capacity Study. Justification for tall buildings is set out in the Scrubs Lane Development Framework Principles and OPDC's Tall Building Statement.
Tall buildings have no place in West London and will blight Wormwood Scrubs.	Sarah Abrahart	No change proposed. High quality tall buildings at appropriate locations will be a component element of the built character and

		environment of the OPDC area. This is set out in OPDC's Tall Building Statement. The Draft New London Plan Policy D8 also recognises that Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. Policy P12 sets out guidance for managing impacts on Wormwood Scrubs.
OPDC needs to reconsider its approach to tall buildings in light of the Grenfell Tower tragedy including considering fire risk and associated costs.	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect draft London Plan policy D11 and Building Regulations requirements. This will be applied to all buildings including tall buildings.
High rise blocks seem synonymous with luxury development, might also be left empty for much of the time. This does not support lifetime neighbourhoods	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies SP2, SP4 provide guidance for development to contribute to delivering Lifetime Neighbourhoods. Policy H1 sets out OPDC's aspirations to work with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London.
High rise development makes it more challenging to deliver affordable housing	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Noted. OPDC recognises that delivering affordable housing in tall buildings can be challenging and this is reflected in the assessments of different densities within OPDC's Affordable Housing Viability Assessment

	Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	supporting study. However, OPDC also recognises that affordable housing can be delivered across a range of building heights subject to addressing relevant challenges.
OPDC should provide evidence for consideration of costs and challenges to deliver tall buildings	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D5 has been amended to meet the requirements of the Draft New London Plan in delivering planning policies for defining the height and location of tall buildings appropriate to the role of a Local Plan. This process is set out in OPDC's Tall Buildings Statement. Evidence for the consideration of costs and challenges to the deliver tall buildings/height densities is set out in OPDC's Whole Plan Viability Study. This tests the ability of a range of development types throughout the OPDC area to viably meet the policy requirements of the Local Plan in accordance with national and best practice guidance. This identifies that viability looks less favourable in the higher density schemes at lower values and higher benchmark land values. However, it goes on to highlight that such schemes will most likely only come forward where the values achievable are able to meet the costs of delivering tall/high density schemes. Therefore, it would be reasonable to expect such schemes to achieve above the mid sales values and more likely the higher sales values.
OPDC should look at international case studies to examine good and bad examples of optimising density without having to build high-rise buildings	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Case studies have been explored in OPDC's Precedents Study and Development Capacity Study. In some instances, high densities can be

	Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	achieved without tall buildings, but in others, OPDC considers it appropriate for development to deliver tall buildings.
Energy demand and low carbon development is challenging at high densities	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The Draft New London Plan continues to provide guidance for delivering low carbon development. OPDC will be publishing supplementary guidance to define how this can be achieved at in tall buildings and high densities.
Should provide alternatives to delivering tall buildings as set out in the Environmental Standards Study	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Defining alternatives to tall buildings would not be in general conformity with the Draft New London Plan. Change proposed. Policy D5 has been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. The information supporting this definition is set out in OPDC's Tall Building Statement. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.

Policy should align with London Plan Policy 7.7 including requiring links to surrounding areas.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the policy is in general conformity with London Plan policy 7.7 and aligns with draft London Plan Policy D8. Policies SP7 and T1 provide guidance to ensure the OPDC area is well connected to surrrounding areas.
The Local Plan should set out a presumpton that tall buildings will not be accepted. It should define that any building taller than 27 metres is a tall building. There should be an automatic trigger for special assessment.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Policies SP9 and D5 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Any building above this height would be subject to the policies set out in Draft New London Plan Policy D8 and Local Plan Policy D5. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.
A Parliamentary enquiry in 2002 found that tall buildings are not essential to the urban renaissance.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies.

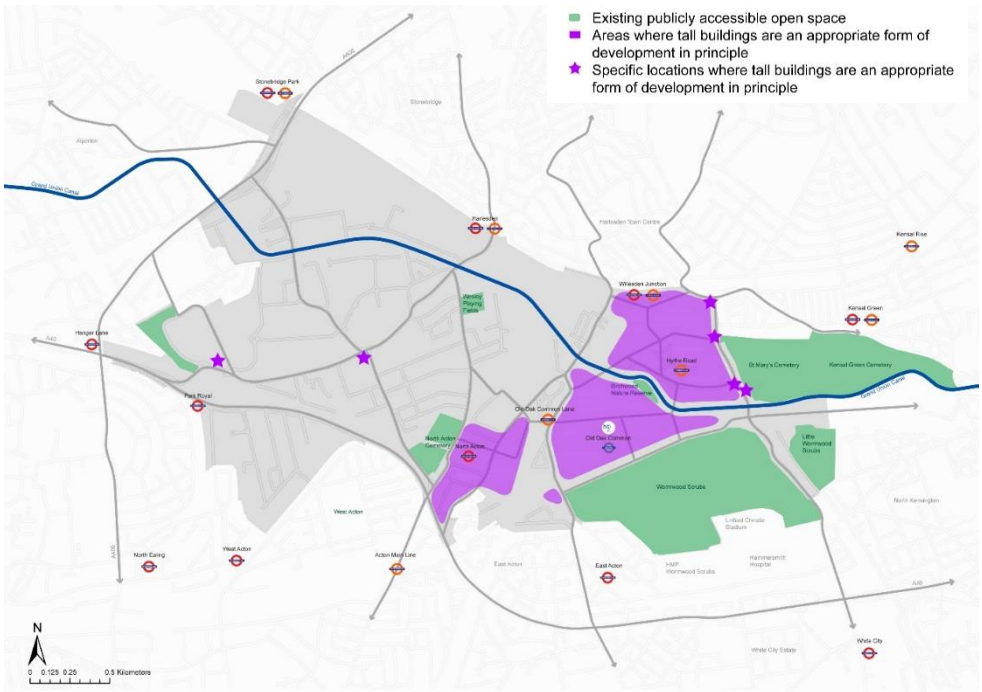
		Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations.
The Local Plan needs to consider historic context in the location of tall buildings.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP9, D4, D5 and D8 provide guidance for ensuring tall buildings conserve and enhance the historic environment. Draft London Plan policy D8 also requires proposals for tall buildings to take account of, and avoid harm to, the signifiance of London's heritage assets.
The Local Plan needs to consider 'Tall Buildings' Historic England guidance note.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Policies SP9 and D5 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Any building above this height would be subject to the policies set out in Draft New London Plan Policy D8 and Local Plan Policy D5. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.
The Local Plan should give careful consideration to how a tall building meets the	Hammersmith Society, Wells House Road Residents Association, Joanna Betts,	Noted. Policies D2, D4 and D5 provide guidance for the relationship between tall

ground.	Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	buildings and the public realm. Draft New London Plan policy D8 also provides guidance for considering the base of tall buildings and relationship with the street.
Tall buildings must be assessed on a number of key factors and meet related requirements	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Alongside Policies SP2, SP9, D2 and D4, Policy D5 sets out these criteria. The London Plan Policy 7.7 and draft London Plan Policy D8 also provide guidance for assessing proposals for tall buildings.
D5c)ii) and D5c)iii) are not justified. The assertion that tall buildings can aid legibility and provide identity to areas is not supported.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The use of building heights to support local legibility is recognised in London Plan paragraph 7.27 and draft London Plan Policy D8.
Tall buildings will create a separation between Old Oak and surrounding areas.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. Local Plan policies SP7 and T1 provide guidance to ensure existing surrounding areas are well connected to Old Oak.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Character Areas Study	• Elements are identified for each character area which should be

	retained or responded to as part of any future development. • A level of potential impact on character is identified for each character area, taking into account the value of existing character and potential impact from future development. • For areas within the OPDC area, character issues to address through future policy interventions or development are identified.
Environmental Modelling Framework Study	• There are no existing definitive standards. The nature and density of development will place big challenges on the quality of the environment including access to daylight and sunlight and changes to the micro climate and wind regime. The tools that are used have been developed for much less dense and tall development. • New parametric modelling should therefore be adopted to test outline development proposals and detailed planning applications to ensure that they meet minimum standards. • New standards should be adopted but this should be done with caution and as development comes forward assessments during the design phase and then in occupation should be undertaken to hone these standards.
Environmental Standards Study	• High density development poses significant challenges to the quality of development in Old Oak and Park Royal. The adoption of short, medium and long term targets should inform all development and applied rigorously or the overall quality of the development and its impact on London could be significant.
Precedents Study	• Lessons learnt from Hudson Yards, Aldgate Place, Highgate Shoreditch Hotel, The Shard and London Bridge Redevelopment and 30 St Mary Axe (Gherkin) on how to deliver high quality tall buildings in high density developments.
Tall Buildings Statement	• Within the OPDC area, a tall building is defined as being above 15 storeys or a minimum of 48 metres above ground level. • Tall buildings are considered to be appropriate in principle in the areas depicted in the image below:  • The definition and locations of tall buildings as an appropriate form

	of development in principle have been defined in accordance with Draft New London Plan policy D8.
Views Study	• Panoramic Views: It will be possible to identify clusters of taller development and individual tall buildings as part of a wider skyline. • Proposes guidelines for the Wormwood Scrubs Character Area to test any proposals for tall buildings in its views and carry out a landscape and visual impact analysis.
Old Oak North Development Framework Principles	• Average shoulder and/or podium height of 8 to 12 storeys above ground level with tall buildings above 15 storeys. • 6 to 8 storeys fronting on to Grand Union Canal. • Tall buildings are appropriate at locations of activity.
Park Royal Development Framework Principles	• Average shoulder and/or podium height of 6 to 8 storeys. • A tall building is appropriate within Park Royal Centre on the north east corner of the ASDA site.
Scrubs Lane Development Framework Principles	• Average shoulder and/or podium height of 6 to 10 storeys. • Lower heights adjacent to Cumberland Park Factory Conservation Area. • 6 to 8 storeys fronting on to Grand Union Canal. • A single tall building is appropriate within each of the four clusters.
Victoria Road and Old Oak Lane Development Framework Principles	• Average shoulder and/or podium height of 8 to 12 storeys. • Lower heights adjacent to sensitive locations. • Tall buildings are appropriate across North Acton and in locations along Old Oak Street within Acton Wells.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D6. Amenity

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Paragraph
17	Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings
68	Where an area justifies a degree of special protection on the grounds of amenity, an Area of Special Control Order may be approved. Before formally proposing an Area of Special Control, the local planning authority is expected to consult local trade and amenity organisations about the proposal. Before a direction to remove deemed planning consent is made for specific advertisements, local planning authorities will be expected to demonstrate that the direction would improve visual amenity and there is no other way of effectively controlling the display of that particular class of advertisement. The comments of organisations, and individuals, whose interests would be affected by the direction should be sought as part of the process.
125	By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Paragraph
Title: What does "Amenity" mean? **Paragraph:** 079 **Reference ID:** 18b-079-20140306 **Revision Date:** 06.03.2014	"Amenity" is not defined exhaustively in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It includes aural and visual amenity (regulation 2(1)) and factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest (regulation 3(2)(a)). It is, however, a matter of interpretation by the local planning authority (and the Secretary of State) as it applies in any particular case. In practice, "amenity" is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement. So, in assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these

	features. This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site. If the advertisement makes a noise, aural amenity would also be taken into account before express consent would be given.
Title: How to Determine the Noise Impact? **Paragraph:** 003 **Reference ID:** 30-003-20140306 **Revision Date:** 06.03.2014	Local planning authorities' plan-making and decision taking should take account of the acoustic environment and in doing so consider: • Whether or not a significant adverse effect is occurring or likely to occur; • Whether or not an adverse effect is occurring or likely to occur; and • Whether or not a good standard of amenity can be achieved.
Title: Planning should promote efficient use of natural resources **Paragraph:** 013 **Reference ID:** 26-013-20140306 **Revision Date:** 06.03.2014	The structure, layout and design of places can help reduce their resource requirements in terms of energy demands, water and land take, and help to sustain natural ecosystems Having a mix of uses and facilities within a neighbourhood can reduce travel demand and energy demands. Ensuring a place is durable and adaptable will help make it less resource hungry over time. For example the layout of infrastructure servicing development (including water supply, sewerage, drainage, gas, electricity, cable, telephone, roads, footpaths, cycle ways and parks) should take account of foreseeable changes in demand to reduce the need for expensive future changes. The layout and design of buildings and planting can reduce energy and water use and mitigate against flooding, pollution and over heating. Passive solar design is the siting and design of buildings to maximise the use of the sun's energy for heating and cooling. Passive solar design takes advantage of natural characteristics in building materials and air to help reduce the additional energy needed for heating and cooling. Policies can encourage sites to be planned to permit good solar access to as many buildings as possible. The potential benefits of passive solar design can only be realised by careful siting and layout. For example, access roads could predominantly run east-west, with local distributors running north-south and glazing minimised on north facing elevations to reduce heat loss. Passive solar design principles can be applied equally effectively in housing and commercial developments. It is important that passive design considers the potential for overheating in the summer, as well as reducing need for heating in the winter.

	A range of design solutions can be considered to help avoid overheating and the need for air conditioning. For example, high levels of thermal mass, maximising natural ventilation, passive cooling using planting for shade, roof overhangs to provide shade for high-sun angles, and smart glazing materials. The urban heat island effect can be reduced by, for example, allowing sufficient space between buildings, tree planting, shading and street layouts which encourage air flow and using light and reflective surfaces or vegetation on buildings.

London Plan (2016)

Chapter 7: London's Living Spaces and Places

7.6 Architecture	**Planning Decisions** Buildings and structures should: • Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG3	Creating a healthy city To improve Londoners' health and reduce health inequalities, those involved in planning and development must: A Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities. B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. C Use the Healthy Streets Approach to prioritise health in all planning decisions. D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments. E Plan for improved access to green spaces and the provision of new green infrastructure. F Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold. G Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.
D12	Agent of Change A The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. B Boroughs should ensure that planning decisions reflect the Agent of

	Change principle and take account of existing noise-generating uses in a sensitive manner when new development, particularly residential, is proposed nearby. C Development proposals should manage noise and other potential nuisances by: 1) ensuring good acoustic design to mitigate and minimise existing and potential impacts of noise generated by existing uses located in the area 2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions secured through planning obligations 3) separating new noise-sensitive development where possible from existing noise-generating businesses through distance, screening, internal layout, sound-proofing and insulation, and other acoustic design measures. D Development should be designed to ensure that established noise generating venues remain viable and can continue or grow without unreasonable restrictions being placed on them. E New noise-generating development, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses. F Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed.
D13	Noise A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by: 1) avoiding significant adverse noise impacts on health and quality of life 2) reflecting the Agent of Change principle to ensure measures do not add unduly to the costs and administrative burdens on existing noisegenerating uses 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity) 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver. B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the

	procedure in Defra's Noise Action Plan for Agglomerations.

Supplementary Planning Guidance (SPG)

Play and Informal Recreation (2012)

Paragraph Reference	Paragraph
3.25	New developments such as high density housing and mixed-use schemes can be designed and operated to improve the environment/public realm for children, young people and other users and create multifunctional spaces. Measures for doing this include: • The imaginative integration of amenity and play space by incorporating planting, landscape, street furniture and play features (particularly on spaces that are above ground). Chapter 4 deals with some of the design issues that need to be resolved.

Accessible London: Achieving an Inclusive Environment (2014)

3.2.5	An inclusive public realm is made up of a coordinated network of legible, safe and accessible routes which provide convenient links to all neighbourhood services, such as retail provision or community facilities, transport connections, public spaces for recreation as well as social activities and other public amenities. The external areas between buildings, public space, open space and amenity areas, are just as important as the buildings themselves.
4.2.21	Areas of amenity space which are proposed as part of a development, whether public or private i.e. residents only, should be of a suitably inclusive design to ensure that all people can use and enjoy them.
4.2.22	Step free access should be provided to areas of amenity space and unnecessary changes in level should be avoided as these could form barriers for some people. The areas should be navigable, and not present users with obstacles or potential hazards. It is recommended that seating is provided to these areas, to allow people to sit and enjoy them for longer.
SPG Implementation Point 15: Amenity Space	Developers and local planning authorities should ensure that amenity space associated with developments incorporates the standards of accessible and inclusive design. The design of these areas should be suitable for everyone regardless of disability, age or gender.
4.3.31	The PERS audits should identify whether the existing pedestrian infrastructure is suitable for its proposed use and that new development improves pedestrian amenity. Pedestrian amenity encompasses a range of factors that, in combination, support environments that encourage more walking. These amenity factors include safety, attractiveness, convenience, information and accessibility

Town Centres (2014)

1.2.29	Across London there is an urgent need to enable local planning authorities to control the proliferation of betting shops and to address the

	implications this can have for maintaining the vitality and viability of town centres, and for protecting their amenity and safety. There is real concern that the current planning treatment of betting shops, reinforced by changes to the licensing system following the Gambling Act 2005, have prevented sensible action to address these issues.
1.2.37	Where planning permission for change of use is required boroughs can help to limit the growth of payday loan shops by resisting such uses where they will result in an over-concentration and where they could impact on the amenity, character, diversity and/or function of an area. However, the ability of boroughs to do so is limited as pay day loan outlets currently (June 2014) do not constitute a distinct Use Class
4.2.11	The Mayor has an aim to increase the cycling mode share (average across London) to 5% by 2026. Research has identified significant potential to increase the proportion of trips to/from town centres that are cycled.8 This is core to achieving the Mayor's cycling target. In line with the Mayor's Vision for Cycling in London , the Mayor will work with TfL and boroughs to deliver a number of infrastructure projects to encourage cycling and improve the safety and amenity of London's streets.
4.4.3	The Mayor and his partners need to ensure that the distribution of goods and services reduces adverse effects on local amenity and the wider transport network, as a large proportion of these movements will be by road.

Sustainable Design and Construction (2014)

2.2.3	Through careful design, developers should ensure their schemes optimise density. The design should enable the development to sit comfortably within the local context and provide a high quality living or working environment, including the provision of amenity and open space.
3.3.2	Urban greening has been identified as a measure to help adapt the city to future climates. Green infrastructure is a network of mainly vegetated spaces and other environmental features, including water features with multifunctional and connectivity benefits. Green infrastructure can have numerous benefits including: • Enhanced amenity and visual interest.
4.4.6	Measures for landscaping and amenity areas: • Incorporate planting, soft landscaping, fencing/barriers and solid balconies to absorb or reflect sound; and • Use surfaces that can reduce noise in highly trafficked areas - both pedestrian and vehicular

Housing (2016)

1.3.45	Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed.
2.3.20	The management of waste and recycling in flatted developments poses particular challenges and needs to be factored into the design of individual dwellings and buildings at an early stage with adequate, accessible and convenient waste and recycling storage and collection facilities provided. Measures should be put in place to manage impacts on residential amenity to acceptable levels in terms of odour, noise and

	dust and address potential safety, security and hygiene issues.
2.3.31	Private open space is highly valued and should be provided in all new housing developments. Minimum private open space standards have been established in the same way as the internal space standards, by considering the spaces required for furniture, access and activities in relation to the number of occupants. The resultant space should be of practical shape and utility and care should be taken to ensure the space offers good amenity.
2.3.46	Where direct sunlight cannot be achieved in line with Standard 32, developers should demonstrate how the daylight standards proposed within a scheme and individual units will achieve good amenity for residents. They should also demonstrate how the design has sought to optimise the amount of daylight and amenity available to residents, for example, through the design, colour and landscaping of surrounding buildings and spaces within a development.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
Principle D3	Proposals should accord with London Plan policies 2.13, 7.6 and 7.7 and deliver: a. a world class exemplary architecture that contributes to the delivery of Lifetime Neighbourhoods; b. a positive contribution to the creation of a coherent public realm, streetscape and wider cityscape; c. greater heights and densities than the surrounding existing context to optimise the use of land in accordance with London Plan policy 2.13(B); d. taller buildings and higher densities should primarily be focussed at stations and other key destinations. There may also be opportunities for some taller elements in other locations so long as such proposals contribute to the creation of a coherent place and accord with the guidance set out in this planning framework; and e. new development should be mindful of their context and in particular sensitive locations in the surrounding area. In these locations lower densities may be more appropriate and applicants will be expected to demonstrate how their development proposals achieve such sensitive design. This is likely to require the highest standards of design.

Local Plan Regulation 18 Draft Policy Options

Paragraph Reference	**Paragraph**
6.69	**London Plan policies are used to manage amenity** The benefit of this option would be the use of a London-wide standardised approach and the provision of a streamlined Local Plan. The disadvantage would be the inability for OPDC to manage specific amenity issues in relation to higher density development.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Residential amenity: In response to questions D7a, allowing a greater impact on residential amenity to facilitate high density development was opposed.	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. OPDC has continued the preferred policy approach of recognising the importance of amenity considerations. Policy D6 sets out OPDC's proposed approach to amenity.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Policy D6 should be more flexible regarding daylight and sunlight levels when increasing density and for open spaces.	Castlepride Limited	No change proposed. OPDC considers Policy D6 provides sufficient flexibility to secure appropriate levels of daylight and sunlight.
Broad support for policy D6	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Air Quality Study	• Adopt a wide range of measures and policies to mitigate against threats to air quality and ensure air quality is comprehensively monitored and assessed when individual developments are proposed. • Manage new development so that it does not add extra emissions to the area. • The area is suitable for declaration as a TfL Low Emissions

	Neighbourhood. • Adopt policies to minimise travel by private vehicle and encourage transport by low emission modes (walking, cycling and public transport). • Adopt innovative solutions to avoid emissions including consolidation of freight and use of clean freight vehicles. • Support extension of Ultra Low Emissions Zone (ULEZ). • Require development to meet the tightest emissions for on-site plant. • Adopt full enclosure of waste sites in line with Environment Agency guidance. • Plan construction activity in detail to minimise dust emissions and adopt highest standards for emissions from all plant and vehicles during construction.
Environmental Modelling Framework Study	• There are no existing definitive standards. The nature and density of development will place big challenges on the quality of the environment including access to daylight and sunlight and changes to the micro climate and wind regime. The tools that are used have been developed for much less dense and tall development. • New parametric modelling should therefore be adopted to test outline development proposals and detailed planning applications to ensure that they meet minimum standards. • New standards should be adopted but this should be done with caution and as development comes forward assessments during the design phase and then in occupation should be undertaken to hone these standards.
Environmental Standards Study	• Minimum standards for air quality, noise and vibration should be set that exceed the government targets by ensuring that development assesses and adopts measures to deliver high quality development.
Energy, daylight and overheating in tall buildings Study	• Provides guidelines for how high density and/or residential tall building developments should be designed to deliver appropriate levels of amenity.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D7. Key Views

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

7. Requiring Good Design

Paragraph Reference	Paragraph
58	Planning policies and decisions should aim to ensure that developments: • Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. • Are visually attractive as a result of good architecture and appropriate landscaping.

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
Title: Planning Should Promote Local Character (Including Landscape Setting) **Paragraph:** 007 **Reference ID:** 26-007-20140306 **Revision Date:** 06.03.2014	The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre. When thinking about new development the site's land form should be taken into account. Natural features and local heritage resources can help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place. Views into and out of larger sites should also be carefully considered from the start of the design process.
Title: A Well Designed Place is Attractive **Paragraph:** 021 **Reference ID:** 26-021-20140306	The way a place looks, sounds, feels, and even smells, affects its attractiveness and long term success. Streetscapes, landscapes, buildings and elements within them all have an influence. So too can more transient elements – such as the way sunshine and shadows move across an area or the way it is maintained and cleaned. Composition of elements and the relationship between colours, textures, shapes and patterns are all important, as is the depth of views, particularly across roofscapes or between buildings.

Revision Date: 06.03.2014	
Title: Consider Layout **Paragraph:** 024 **Reference ID:** 26-024-20140306 **Revision Date**: 06.03.2014	The layout of areas, whether existing or new, should be considered in relation to adjoining buildings, streets and spaces; the topography; the general pattern of building heights in the area; and views, vistas and landmarks into and out of the development site.
Title: Consider Scale **Paragraph:** 026 **Reference ID:** 26-026-20140306 **Revision Date:** 06.03.2014	The size of individual buildings and their elements should be carefully considered, as their design will affect the: overshadowing and overlooking of others; local character; skylines; and vistas and views. The scale of building elements should be both attractive and functional when viewed and used from neighbouring streets, gardens and parks.

London Plan (2016)

Chapter 2: London's Places

Paragraph Reference	Paragraph
2.10 Central Activities Zone – Strategic Priorities	**Strategic** d. Sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components such as the River Thames, the Royal Parks, World Heritage Sites, designated views and more local features including the public realm and historic heritage, smaller open spaces and distinctive buildings, through high quality design and urban management

Chapter 7: London's Living Spaces and Places

7.7 Location and Design of Tall and Large Buildings	**Planning Decisions** D. Tall buildings: a. Should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference b. Should not impact on local or strategic views adversely.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
HC3	Strategic and Local Views G Boroughs should clearly identify important local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

Supplementary Planning Guidance (SPG)

Character and Context (2014)

2.15	An understanding of the character and context of a place can help to: • Identify, conserve and manage key views, including the consideration of the siting of tall buildings.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Principle OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.

Local Plan Regulation 18 Draft Policy Options

Policy	Paragraph Reference	Paragraph
D7. Key Views	N/A	N/A

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Local context: Policy D4 should set out that development should reflect existing local context.	Hammersmith and Fulham Historic Buildings Group, 12 local residents	No change proposed. Policy SP9 requires development to respond to local character and context but 'reflecting'

		local context would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities and tall buildings.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support for policy D7	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Policy is unsound	Sarah Abrahart	No change proposed. No reason has been given as to why the policy is unsound.
Clarity required for whether views are protected from within the OPDC area or surrounding areas	Scott Cawley	Change proposed. The supporting text has been amended to provide clarity that the policy applies to development within the OPDC area.
Additional key view from the Round Pond in Kensington Gardens is proposed.	Royal Borough of Kensington and Chelsea	No change proposed. OPDC does not consider it appropriate to identify Kensington Gardens Round Pond as a viewing point as development is highly unlikely to be viewable from this location.
Clarification sought about policy D7 and relationship to other mechanisms managing views. Suggest that a refined policy approach is taken to managing different types of view. Object to inclusion of kinetic views from railway lines and those outside of LVMF views or related to designated heritage assets.	Old Oak Park Limited	Change proposed. OPDC considers it appropriate to provide further clarification for the role and assessment of kinetic views.

Too much detail is required about effects on key views. This is better determined in an EIA scoping exercise	Old Oak Park Limited	No change proposed. OPDC considers that supporting information aligns with standard practice for Townscape/Visual Impact Assessments and should be included to inform EIA scoping considerations.

Summary of Relevant Evidence Base

Supporting Study	Recommendations
Heritage Strategy	• Recommendations made on where identified heritage views should be considered. • Grand Union Canal: Future proposals should seek to celebrate views of the bridges which cross the canal as important moments defining the length of the canal. This could form a key element in the legibility and wayfinding strategy for the area, and could also help to define a hierarchy of space as part of a public realm strategy. • Heritage Assets: Where appropriate, proposals should seek to open up views of key buildings as a way of assisting wayfinding or reinforcing local character. • Scrubland and Open Space (Existing Character): People acknowledged the number of views from Wormwood Scrubs, including views north and east towards the Shard, and felt that these should be protected.
Views Study	• The Views Study provides a baseline study of views within and surrounding the OPDC area. It seeks to identify important views and provides recommendations and guidelines in terms of future development. • Identifies five different types of views: Panoramic, kinetic, local views from open spaces, linear and heritage. • Key recommendations made by the Views Study are: a. Use views to assist wayfinding in a chaotic environment. b. Opportunities to see buildings of interest are generally oblique or glancing views; these need to be preserved. c. Developers will need to agree with Planning Authority which views are relevant to their proposal. d. Heritage views development guidelines need to be adhered to.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D8. Heritage

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Achieving Sustainable Development

Policy / paragraph reference	Paragraph
7	There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles: … **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
9	Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to): • making it easier for jobs to be created in cities, towns and villages; • moving from a net loss of bio-diversity to achieving net gains for nature; • replacing poor design with better design; • improving the conditions in which people live, work, travel and take leisure; and • widening the choice of high quality homes.
17	Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
126	Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment[1], including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account: • The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation • The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring • The desirability of new development making a positive contribution to local character and distinctiveness; and

	• Opportunities to draw on the contribution made by the historic environment to the character of a place
128	In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
129	Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
130	Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.
131	In determining planning applications, local planning authorities should take account of: • the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and • the desirability of new development making a positive contribution to local character and distinctiveness.
132	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
133	Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: • The nature of the heritage asset prevents all reasonable uses of the site • No viable use of the heritage asset itself can be found in the medium

	term through appropriate marketing that will enable its conservation • Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible • The harm or loss is outweighed by the benefit of bringing the site back into use
134	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
135	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
136	Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
139	Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.
141	Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.30 However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.
169	Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	**Paragraph**
Title: What is the policy for the historic environment? **Paragraph:** 001 **Reference ID:**	Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework's drive to achieve sustainable development (as defined in paragraphs 6-10. The appropriate conservation of heritage assets forms one of the 'Core Planning Principles' (paragraph 17 bullet 10) that underpin the planning system. This is expanded upon principally in paragraphs 126-141 but policies giving effect to this objective appear elsewhere in the National Planning Policy Framework.

18a-001-20140306 **Revision Date:** 06 03 2014	
Title: What is the main legislative framework for planning and the historic environment? **Paragraph:** 002 **Reference ID:** 18a-002-20140306 **Revision Date:** 06 03 2014	In addition to normal planning framework set out in the Town and Country Planning Act 1990: • the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest • the Ancient Monuments and Archaeological Areas Act 1979 provides specific protection for scheduled monuments • the Protection of Wrecks Act 1973 provides specific protection for protected wreck sites Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.
Title: What is meant by the conservation and enhancement of the historic environment? **Paragraph:** 003 **Reference ID:** 18a-003-20140306 **Revision Date:** 06.03.2014	The conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits. Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use to as yet undiscovered, undesignated buried remains of archaeological interest. In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary. Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified, the aim then is to capture and record the evidence of the asset's significance which is to be lost, interpret its contribution to the understanding of our past, and make that publicly available.
Title:	In line with the National Planning Policy Framework, local authorities

What is a positive strategy for conservation and enjoyment of the historic environment? **Paragraph:** 004 **Reference ID:** 8a-004-20140306 **Revision Date:** 06.03.2014	should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Such as a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset. The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Local planning authorities should consider the relationship and impact of other policies on the delivery of the strategy for conservation.
Title: Should non-designated heritage assets be identified in the Local Plan **Paragraph:** 006 **Reference ID:** 18a-006-20140306 **Revision Date:** 06.03.2014	While there is no requirement to do so, local planning authorities are encouraged to consider making clear and up to date information on their identified non-designated heritage assets, both in terms of the criteria used to identify assets and information about the location of existing assets, accessible to the public. In this context, the inclusion of information about non-designated assets in Local Plans can be helpful, as can the identification of areas of potential for the discovery of non-designated heritage assets with archaeological interest.
Title: What is “significance”? **Paragraph:** 008 **Reference ID:** 18a-008-20140306 **Revision Date:** 06.03.2014	“Significance” in terms of heritage policy is defined in the Glossary of the National Planning Policy Framework. In legislation and designation criteria, the terms ‘special architectural or historic interest’ of a listed building and the ‘national importance’ of a scheduled monument are used to describe all or part of the identified heritage asset’s significance. Some of the more recent designation records are more helpful as they contain a fuller, although not exhaustive, explanation of the significance of the asset.
Title: What is the setting of a heritage asset and how should it be taken into account? **Paragraph:**	The “setting of a heritage asset” is defined in the Glossary of the National Planning Policy Framework. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Setting is the surroundings in which an asset is experienced, and may

013 **Reference ID:** 18a-013-20140306 **Revision Date:** 06.03.2014	therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.
Title: How to assess if there is substantial harm? **Paragraph:** 017 **Reference ID:** 18a-017-20140306 **Revision Date:** 06.03.2014	What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm. Policy on substantial harm to designated heritage assets is set out in paragraphs 132 and 133 to the National Planning Policy Framework.
Title: What are non-	The National Planning Policy Framework identifies 2 categories of non-designated site of archaeological interest:

designated heritage assets and how important are they? **Paragraph:** 039 **Reference ID:** 18a-039-20140306 **Revision Date:** 06.03.2014	(1) Those that are demonstrably of equivalent significance to scheduled monuments and are therefore considered subject to the same policies as those for designated heritage assets (National Planning Policy Framework paragraph 139). They are of 3 types: • those that have yet to be formally assessed for designation • those that have been assessed as being nationally important and therefore, capable of designation, but which the Secretary of State has exercised his discretion not to designate usually because they are given the appropriate level of protection under national planning policy • those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979 because of their physical nature The reason why many nationally important monuments are not scheduled is set out in the document Scheduled Monuments, published by the Department for Culture, Media and Sport (DCMS). Information on location and significance of such assets is found in the same way as for all heritage assets. Judging whether sites fall into this category may be assisted by reference to the criteria for scheduling monuments. Further information on scheduled monuments can be found on the Department for Culture, Media and Sport's website. (2) Other non-designated heritage assets of archaeological interest. By comparison this is a much larger category of lesser heritage significance, although still subject to the conservation objective. On occasion the understanding of a site may change following assessment and evaluation prior to a planning decision and move it from this category to the first Where an asset is thought to have archaeological interest, the potential knowledge which may be unlocked by investigation may be harmed even by minor disturbance, because the context in which archaeological evidence is found is crucial to furthering understanding. Decision-taking regarding such assets requires a proportionate response by local planning authorities. Where an initial assessment indicates that the site on which development is proposed includes or has potential to include heritage assets with archaeological interest, applicants should be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation. However, it is estimated following an initial assessment of archaelogical interest only a small proportion – around 3% – of all planning applications justify a requirement for detailed assessment.
Title: Planning Should Promote Local Character (Including Landscape Setting)	Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.

Paragraph: 007 **Reference ID:** 26-007-20140306 **Revision Date:** 06 03 2014	

London Plan (2016) Policies

Chapter 2: London's Places

Policy / paragraph reference	Paragraph
2.10 Central Activities Zone – Strategic Priorities	**Strategic** d. Sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components such as the River Thames, the Royal Parks, World Heritage Sites, designated views and more local features including the public realm and historic heritage, smaller open spaces and distinctive buildings, through high quality design and urban management.
2.11 Central Activities Zone – Strategic Functions	**Strategic** b. Seek solutions to constraints on office provision and other commercial development imposed by heritage designations without compromising local environmental quality, including through high quality design to complement these designations.

Chapter 7: London's Living Spaces and Places

7.5 Public Realm	**Planning Decisions** B. Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate. C. Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue Ribbon Network and parks and others that may be of heritage significance.
7.7 Location and Design of Tall and Large	**Planning Decisions** E. The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and

Buildings	gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.
7.8 Heritage Assets and Archaeology	**Strategic** A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account. B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology **Planning Decisions** C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. **LDF Preparation** F. Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration. G. Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.
7.9 Heritage-Led Regeneration	**Strategic** A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm. **Planning Decisions** B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

	LDF Preparation C. Boroughs should support the principles of heritage-led regeneration in LDF policies.
7.10 World Heritage Sites	**Strategic** A. Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value. The Mayor has published Supplementary Planning Guidance on London's World Heritage Sites – Guidance on Settings to help relevant stakeholders define the setting of World Heritage Sites. **Planning Decisions** B. Development should not cause adverse impacts on World Heritage Sites or their settings (including any buffer zone). In particular, it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. In considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plans. **LDF Preparation** C. LDFs should contain policies to: a. Protect, promote, interpret, and conserve, the historic significance of World Heritage Sites and their Outstanding Universal Value, integrity and authenticity. b. Safeguard and, where appropriate, enhance both them and their settings. D. Where available, World Heritage Site Management Plans should be used to inform the plan making process.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
HC1	Heritage conservation and growth A Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology within their area. B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by: 1) setting out a clear vision that recognises and embeds the role of heritage in place-making 2) utilising the heritage significance of a site or area in the planning and design process 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place 4) delivering positive benefits that sustain and enhance the historic

	environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing. C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets. E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Supplementary Planning Guidance (SPG)

Character and Context (2014)

2.15	An understanding of the character and context of a place can help to: • Recognise local historic character and contribute to conservation management - understanding sites and assets in context, including identification, conservation and management of heritage assets, significance and setting.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Principle D4	Proposals should accord with London Plan Policy 7.8 and enhance built heritage assets to contribute to successful placemaking.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Paragraph
6.60	In light of the strong national and regional guidance provided for managing heritage, providing alternative policy options is not considered to be appropriate.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Local list: Support for the development of a local list was provided.	Grand Union Alliance, Midland Terrace Residents Group, Old Oak Interim Forum, Wells House Road Residents Association, Hammersmith and Fulham Historic Buildings Group, 1 local resident	Change proposed. OPDC's proposed locally listed buildings are set out in the Heritage Strategy. OPDC plans to consult on and agree the Local List alongside the progression of the Local Plan to its adoption.
Local list suggestions: The Grand Junction Arms public house, Stonebridge Station, Willesden Junction Station and 308-310 Elveden Road were suggested to be locally listed.	Brent Council	Noted. These suggestions were used to inform the Heritage Strategy. OPDC plans to consult on and agree the Local List alongside the progression of the Local Plan to its adoption.
Conservation area: A new conservation area was suggested for the length of the Grand Union Canal in Brent.	Brent Council, The Hammersmith Society	Noted. This suggestion has been incorporated into OPDC's Heritage Strategy and OPDC plans to consult on the potential for a Conservation Area in this location later in 2017.
Conservation area: The designation of the proposed Cumberland Park Factory Conservation Area was supported.	Brent Council, Diocese of London, Historic England, Midland Terrace Residents Group, Old Oak Interim Forum, The Hammersmith Society, Local resident, Hammersmith and Fulham Historic Buildings Group	Noted. Cumberland Park Factory Conservation Area was designated in February 2017.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support approach to working with stakeholders to address heritage assets at risk	Historic England	Noted.
Suggest completion of outstanding conservation area appraisals, in particular for Cumberland Park Factory and St Mary's Cemetery.	Historic England	Noted. OPDC is progressing the development new conservation area designations and refreshing existing conservation areas appraisals and management

		guidelines.
Support development of a Local List and / or other non-designated heritage assets	Historic England, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC has consulted on local heritage listings, including the Local List.
D8 should provide policy for how designated heritage assets will be considered rather than defer to the NPPF and national guidance. This will ensure accordance with NPPF paragraphs 9, 12 and 126.	Historic England	Change proposed. The policy has been amended to include policy guidance for designated heritage assets.
D8 needs to clarify whether it relates to scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, or archaeology which is neither. If the latter the policy reference is fine but if not the policy is the wrong test. You may wish to qualify Part (d) as follows: "Where harm can be fully justified, where relevant, the Council will require archaeological excavation and/or recording as appropriate, an Archaeological Impact Assessment and publication of the results."	Historic England	Change proposed. The OPDC area does not have any scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments. As such, OPDC considers that Policy D8 accords with National Planning Policy Framework paragraph 123 and National Planning Policy Guidance Paragraph: 040 Reference ID: 18a-040-20140306. To provide clarity and consistency with national guidance, the supporting text has been amended accordingly.
Policy could refer to the statutory test for development proposals within conservation areas.	Historic England	No change proposed. OPDC does not consider it necessary to repeat legislation and national guidance for managing conservation areas.
Policy should refer to the role of Historic Environment Record, Local List, Conservation Area	Historic England	Change proposed. The supporting text has been amended to make reference to the use of heritage tools in

Appraisals and Management Plans in shaping future change within the plan area.		shaping the future of an area.
Policy is unsound	Sarah Abrahart	No change proposed. No reason has been given as to why the policy is unsound.
Paragraph 5.65 states a commitment in to work with RBKC regarding heritage assets within the borough that are on the Heritage at Risk Register, which is welcomed.	Royal Borough of Kensington and Chelsea	Noted.
There are several important heritage buildings in the OPDC area	Hammersmith and Fulham Historic Buildings Group	Noted.
Should commemorate the heritage of the area through street and building names	Hammersmith and Fulham Historic Buildings Group	Noted. This is not a planning policy issue. Street names and building names are agreed by the local authority but OPDC will work positively with the relevant local authority to try to ensure that heritage is referenced through building and street names.
Support Hammersmith and Fulham Historic Buildings Group's analysis of heritage assets and Old Oak Outline Historic Area Assessment	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Support heritage led development, where appropriate.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
The area should build on the existing cultural heritage and industrial legacy	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Noted. Policy D8 through OPDC's Heritage Themes provide this guidance.

	Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Figure 5.8: German Gymnasium, Kings Cross is not an appropriate precedent.	Regents Network	No change proposed. OPDC considers the German Gymnasium to be an appropriate precedent.
Figure 5.9: The Eagle, Old Street is not an appropriate precedent.	Regents Network	No change proposed. OPDC considers the Eagle to be an appropriate precedent.
The canal is a considerable heritage item which is not recognised in the Local Plan	Regents Network	No change proposed. OPDC considers the Grand Union Canal is appropriately recognised as a key asset throughout the Local Plan.
Numerous suggestions for features along the canal that should be considered as being of interest for heritage	Regents Network	Noted. OPDC will use this information to inform the development of the Grand Union Canal Conservation Area Appraisal and Management Guidelines.
Support for depicting assets on policies map	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Welcome identification of the Canal as of heritage theme, but would suggest further wording to require relationship between themes is considered in applications.	Canal & River Trust	Change proposed. OPDC considers it appropriate to deliver a holistic approach in conserving and enhancing OPDC's heritage themes. Policy D8 has been amended accordingly.
Non-designated heritage assets should be maintained as a live register and not designated within the Local Plan.	London Borough of Ealing	Noted. OPDC has separately consulted on local heritage listings, including the Local List.
The Castle pub does not meet the criteria to be locally listed as set out by Historic England and Ealing Council. The emphasis of draft policies TCC7 and P7C1 should be reworded accordingly.	Citrus Group and Fuller Smith & Turner	No change proposed OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designated as a non-designated heritage

		asset on OPDC's Local List. This is based on the recognition that it has historic, townscape, architectural and social signifiance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form.
Clarity is required for: How promoting heritage assets relates to NPPF's requirement to sustain and enhance heritage assets. Sequentional approach for managing non-designated assets. Table 5.3 relating to non-designated assets goes beyond NPPF requirements to taken into account non-designated assets' significance. Lack of guidance for designated assets.	Old Oak Park Limited	No change proposed. OPDC considers the policy and supporting text to be sufficiently clear in defining out promoting and enhancing the significance of heritage assets can include their reuse. No change proposed. OPDC considers the approach to managing non-designated heritage assets accords with NPPF paragraph 135 and to support the provision of a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. Change proposed. OPDC considers it appropriate to provide policy that reflects NPPF guidance to conserve and enhance designated heritage assets. Policy D8 has been amended accordingly.
Additional detail should be added to the policy with regard to conservation areas.	London Borough of Hammersmith and Fulham	Change proposed. Additional information for managing the demolition of buildings in conservation areas has been added to supporting text to policy D8.
Policy should provide clarity regarding securing planning contributions to conserve and enhance heritage assets	Historic England	Change proposed. The supporting text has been amended to make reference to securing planning obligations to conserve and enhance heritage assets.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Character Areas Study	• Elements are identified for each character area which should be retained or responded to as part of any future development. • A level of potential impact on character is identified for each character area, taking into account the value of existing character and potential impact from future development. • For areas within the OPDC area, character issues to address through future policy interventions or development are identified.

Heritage Strategy	Outlines a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Old Oak Outline Historic Area Assessment	• Informs the development of planning policy for Old Oak and the designation of local heritage assets.
	• The key outputs of this study include:
	  a. Summary of historical development.
	  b. Identification of designated and undesignated potential heritage assets.
	  c. Identification of designated assets whose settings may be affected by development within Old Oak.
	• Makes the key recommendation that heritage assets should be locally designated. This includes the Cumberland Park Factory conservation area.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

D9. Play Space

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Achieving Sustainable Development

Paragraph Reference	Paragraph
7	There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles: • A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

8. Promoting Healthy Communities

69	Planning policies and decisions, in turn, should aim to achieve places which promote: • Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity.

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
Title: A Well Designed Place Supports Mixed Uses and Tenures **Paragraph:** 017 **Reference ID:** 26-017-20140306 **Revision Date:** 06.03.2014	A good mix of uses and tenures is often important to making a place economically and socially successful, ensuring the community has easy access to facilities such as shops, schools, clinics, workplaces, parks, play areas, pubs or cafés. This helps achieve multiple benefits from the use of land, and encourage a healthier environment, reducing the need for travel and helping greater social integration.

Title: A Well Designed Public Space is Lively **Paragraph:** 018 **Reference ID:** 26-018-20140306 **Revision Date**: 06.03.2014	The most successful spaces exhibit functional and attractive hard and soft landscape elements, with well orientated and detailed routes and include facilities such as seats and play equipment.

Health and Wellbeing

Title: What are the Links Between Health and Planning? **Paragraph:** 002 **Reference ID:** 53-002-20140306 **Revision Date:** 06.03.2014	The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how: • Opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation).
Title: What is a Healthy Community? **Paragraph:** 005 **Reference ID:** 53-005-20140306 **Revision Date:** 06.03.2014	A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage: • Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.

London Plan (2016) Policies

Chapter 3: London's People

Paragraph Reference	Paragraph

3.6 Children and Young People's Play and Informal Recreation Facilities	**Strategic** A. The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible. **Planning Decisions** B. Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation sets out guidance to assist in this process. **LDF Preparation** C. Boroughs should: a. Undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities. b. Produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.

Chapter 7: London's Living Spaces and Places

7.1 Lifetime Neighbourhoods	**Strategic** A. In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles set out in paragraph 7.4A. **Planning Decisions** B. Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport. C. Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods. D. The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood. E. The policies in this chapter provide the context within which the targets set out in other chapters of this Plan should be met. **LDF Preparation** F. Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate. G. Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
S4	A Boroughs should: 1) undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision 2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs. B Development proposals for schemes that are likely to be used by children and young people should: 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile 2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: a) provides a stimulating environment b) can be accessed safely from the street by children and young people independently c) forms an integral part of the surrounding neighbourhood d) incorporates trees and/or other forms of greenery. 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

Supplementary Planning Guidance (SPG)

Planning for Equality and Diversity in London (2007)	**SPG Implementation Point 3k: Family housing** Housing needs of larger families in London need to be addressed by borough planning documents. Planning and design needs to be integrated with providing the community infrastructure to support families, including child care and health facilities. Larger housing units for large families and suitable play spaces should be planned within high-density design.
Play and Informal Recreation (2012)	**Full SPG**

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Principle D2	Proposals should: Deliver a grid of amenity spaces (public, private, communal) that contributes to the creation of healthy Lifetime Neighbourhoods as depicted in figure 14

	and that: a. contributes to the delivery of the Mayor's All London Green Grid SPG; b. caters for the needs of new and existing communities; c. are laid out as a well-connected legible grid; d. are well-designed and with clear management and maintenance plans; e. facilitates clear connections between stations; f. protects, improves and connects into existing open spaces; g. includes coordinated urban greening along streets, in public open spaces and along the Grand Union Canal; h. connects biodiversity assets to support habitat resilience; and i. mitigates flood risk through the delivery of sustainable urban drainage measures.

Local Plan Regulation 18 Draft Policy Options

Paragraph Reference	Paragraph
N/A	N/A

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
N/A	N/A	N/A

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support requirement for development to provide or contribute to play space.	Sport England	Noted.
Not all dedicated play space for 0 to 5s should be publicly accessible within small open spaces or pocket parks. Change to "where appropriate"	Old Oak Park Limited	No change proposed. OPDC considers that seeking to deliver dedicate play space in publicly accessible open space will support maximising abilities to play in a high density environment. OPDC also recognises that not all sites will be able to contribute to the delivery of play space in publicly accessible open space. This is particularly relevant for early development sites and

		those outside of Old Oak North and South. D9 refers to delivering these spaces "as a priority" to provide an appropriate level of flexibility. Draft New London Plan policy S4 also seeks to deliver play provision that can be accessed form the street and forms an integral part of the surrounding neighbourhoods.
Target for 4 hours sunlight on 50% of playspace on 21 March will be challenging given the densities required to meet the housing targets	Old Oak Park Limited, Castlepride Limited	Change proposed. Although OPDC considers that delivering a minimum amount of 4 hours of solar exposure on 50% of dedicated child play space to be critical in delivering well-used play space, supporting text to the policy has been amended to reflect that this may be challenging in a high density environment.
The focus on the provision of play space for 0-5 year olds is welcomed but more development is required for the planning for provision for play for 6 to 18 year olds. As well as designated play spaces the environment needs to be designed to enable street play close to where children live and as schools are modified or built.	London Borough of Hammersmith and Fulham	No change proposed. Policy D9 does provide policy for over 5s, but the GLA provides more detailed guidance on play in the London Plan and SPG, which has not been repeated here.
Support provision of play space, and this is particularly important for teenagers / older children.	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted
Air quality policy EU4 should be cross referenced with this policy. Question use of where relevant and appropriate in relation to delivering this policy.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Change proposed. The text has been amended to cross-reference Policy EU4.

	Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Play facilities should be provided for all ages and linked to SP8 and D2	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D9 requires development to contribute to maximising opportunities for play for all ages. The Policy links section makes reference to all design policies and Strategic Policy SP8.
Permitted play space currently does not meet Local Plan requirements. Play space should not be roofs.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Mayor of London's Play and Recreation SPG states: "In new developments, the use of roofs and terraces may provide an alternative to ground floor open space where they are safe, large enough, attractive and suitable for children to play, careful consideration should be given to these options, including the need for supervision and any restrictions that this might put on the use of the facilities" and "The use of roofs, terraces and indoor space can be an alternative to ground floor open space but issues about safety and supervision should be given careful consideration". OPDC considers the provision of play space above ground floor is appropriate subject to meeting this guidance and that set out in D9. Schemes granted planning permission by OPDC planning committee meet the requirements of the Mayor of London's Play and Recreation SPG and D9.
Development at Old Oak should provide ample child play space for existing and new communities to combat rising childhood obesity levels.	Bini Ghebreyes	Noted. The amount of open space to meet need will be delivered in accordance with the latest OPDC and GLA guidance. Currently this is informed by GLA's

		Population Yield Calculator and Play and Recreation SPG.
Active Design should be clearly referenced across relevant Design policies.	Sport England	Change proposed. OPDC has amended the text to make reference to encouraging activity to be beneficial to the health and well-being of local people.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendation
Environmental Modelling Framework Study	• Outdoor sunlight: Direct sunlight in the spaces between buildings is equally important to support outdoor activities, children's play, encourage plant growth, dry out the ground reducing moss and slime, and generally improve the appearance of the public realm.
Environmental Standards Study	• Recommendation: Public spaces should benefit from good daylight, sunlight and microclimate, be located in publicly accessible open spaces, they should provide a good mix of facilities, including play and exercise equipment, be well located close to neighbourhoods and provide multiple functions (biodiversity, SuDS, play, connectivity, and shade). • Target: A minimum of 10sqm of dedicated play space per child. • Green Streets: Outdoor seating and children's play to be sited in areas of the street with maximum daylight and sunlight. • Catering for Families: Serious consideration needs to be given to housing families with children above ground level. Families should have their own access or front door, with door-step play space for children under five close to the home.
Precedents Study	• Lessons learnt from Queen Elizabeth Olympic Park, The Plimsoll Building, Holy Trinity School, Madrid Rio, Tumbling Park Playground and Frontside Skate Gardens on how to deliver high quality play space in high density developments.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**